

Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information

A. Corporate Disclosure Policy:

1. This Code of Corporate Disclosure Practices will be applicable to '**Sadhana Nitro Chem Limited**'
2. To ensure timely and adequate disclosure of price sensitive information
3. Prompt disclosure of price sensitive information.
4. Price sensitive information shall be given by the company to Stock Exchange and disseminated on a continuous and immediate basis.
5. The Company may also consider ways of supplementing information released to Stock Exchange by improving investor access to their public announcements.
6. Overseeing and Co-coordinating disclosure
7. The Company hereby designates Compliance officer of the Company as the official Spokesperson ('the Spokesperson') of the Company to oversee corporate disclosure.
8. The Spokesperson shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media and educating staff and disclosure policies and procedure.
9. Information disclosure/ dissemination shall be approved in advance by the spokesperson.
10. If information is accidentally disclosed without prior approval the person Responsible may inform the Spokesperson immediately, even if the information is not considered price sensitive.
11. Responding to market rumors
12. The company shall have clearly laid down procedures for responding to any queries or requests for verification or denying rumors and then making the disclosure.
13. Timely Reporting of shareholdings/ownership and changes in ownership.
14. Disclosure of shareholdings/ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Act and the listing agreement shall be made in a timely and adequate manner.
15. Disclosure/dissemination of Price Sensitive Information with special reference to Analysts, Institution Investors shall be made by the Spokesperson.

B. The Spokesperson to follow the guidelines given hereunder while dealing with analysts and institution investors:

- (i) Only Public information to be provided

The Spokesperson shall provide only public information to the analysts, research persons, large investors like institutions. Alternatively, the information given to the analyst should be simultaneously made public at the earliest.

- (ii) Recording of discussion.

In order to avoid misquoting or misrepresentation, it is desirable that at least two Company representative as decided by the Spokesperson be present at meeting with analysts, brokers or Institutional Investors and discussion should preferably be recorded.

- (iii) Handling of unanticipated question.

The Spokesperson should be careful when dealing with analysts questions that raise issues outside the intended scope of discussion. Unanticipated questions may be taken in notice and a considered response given later, if the answer includes price sensitive information, a public announcement should be made before responding.

- (iv) Simultaneous release of Information.

When the Spokesperson organizes meetings with analysts, the Company shall make a press release or post relevant information on its website after every such meet. The company may also consider live web casting of analysts meets.

C. Medium of disclosure/dissemination:

- a) Disclosure/dissemination of information may be done through various medias so as to achieve maximum reach and quick dissemination
- b) The Spokesperson shall ensure that disclosure to stock exchange is made promptly.
- c) The Spokesperson may also facilitate disclosure through the use of their dedicated internet website.
- d) Company websites may provide a means of giving investors a director access to analyst briefing material, significant background information and questions and answers
- e) The Information filed by the company with the exchange under continuous disclosure requirement may be made available on the company website.
