

# **CHEMFAB ALKALIS LIMITED**

## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

(formulated in line with Sub Regulation (1) of Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 with schedule A thereof)

- ❖ This Code may be called “ **CAL Code for Fair Disclosure of Unpublished Price Sensitive Information**”
- ❖ This Code may come in to force from 15<sup>th</sup> May 2015.
- ❖ Covenants of the Code

1. CAL shall ensure prompt public disclosure of Unpublished Price Sensitive Information(UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

‘UPSI’ means any information which is likely to materially affect the price of the securities and shall include financial results, dividends, change in capital structure, mergers, demergers, acquisitions, delistings, disposals and expansion of business and such other transactions, changes in key managerial personnel and material events in accordance with the Listing Agreement.

‘Generally available information’ means information that is accessible to the public on a non-discriminatory basis’

2. CAL shall ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
3. CAL has designated Mr.G.Somasundaram, Company Secretary as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI
4. CAL shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. CAL shall ensure to make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. CAL shall ensure information shared with analysts and research personnel is not an UPSI
7. CAL shall be developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. CAL shall handle all UPSI on a need-to-know basis.

Persons of CAL, who are in possession or access to UPSI shall handle such

information with care and to deal with the information with them when transacting their business strictly on need-to-know basis.