

PADMANABH ALLOYS & POLYMERS LIMITED

**CODE OF PRACTISE AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

This Code has been formulated in terms of Sub-Regulation (1) of Regulation 8 of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. It contains the Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, which are as under:

1. There shall be prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. There shall uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure shall be ensured.
3. The Chief Investor Relations Officer shall deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop 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. The Company shall ensure the handling of all unpublished price sensitive information on a need-to-know basis.
9. The Company will periodically inform / counsel the top tier management to sensitize them on the Code and provide clarification on its application, whenever necessary.
