



AGRO PHOS (INDIA) LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Principles of fair disclosure pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A to the said Regulations)

The Company believes in adopting, practising and upholding the highest standards of professionalism, honesty, integrity and ethical behaviour in order to prohibit and prevent insider trading in the Company's securities. Towards this end, the company has formulated a Code of Conduct to be followed by its directors, employees and advisers, consultants and retainers who, in the opinion of the Company, may have access to price sensitive information (hereinafter referred to as "Designated Persons").

The Company adopts principles, practices and procedures as under to ensure fair disclosure of unpublished price sensitive information and undertakes to follow the same:

1. The company and the 'Designated Persons' shall maintain confidentiality of all unpublished price sensitive information (hereinafter referred to as 'UPSI'), shall communicate the same purely on 'need-to-know basis' and shall not communicate to any unauthorised person or on selective basis.
2. The Company shall ensure uniform and universal dissemination of UPSI to avoid any selective disclosure of such information.
3. The Company shall promptly disclose UPSI once such credible and concrete information comes into being.
4. The Company shall disclose UPSI by making its prompt disclosure with sufficient and unambiguous details to the Stock Exchanges on which its securities are listed. The Company shall also disclose UPSI on its website.
5. In case the Company finds that any UPSI has been disclosed selectively, inadvertently or otherwise, it shall promptly disclose and disseminate as soon as the circumstances permit such information to make it uniformly and universally available to general public.
6. The Company designates its 'Company Secretary' as its Chief Investor Relations Officer and entrusts him with the function of dissemination and disclosure of UPSI. The Company Secretary is entrusted with giving appropriate and fair response to the regulatory authorities in respect of queries, questions and explanations in relation to news reports and market rumours.
7. The Company shall ensure that no UPSI is shared with analysts and researchers on selective basis.
8. The Company shall ensure that its conferences with analysts and investors shall be open to participation by all analysts, shareholders, investors and general public.
9. The Company shall record/make transcript of proceedings of its conferences with analysts/investor conferences and make the same accessible to all by uploading the same on its website.