



## **GANESH BENZOPLAST LIMITED**

### **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for adhering to the Principles of Fair Disclosure**

Pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.

The Company shall adhere to the following practices and procedure to ensure fair disclosure of price sensitive information such as the events and occurrence that could impact price of securities in the market.

- (1) The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- (2) The Company shall make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- (3) The Compliance Officer of the Company appointed under the SEBI (PIT) Regulations 2015 shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- (4) The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (5) The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (6) The Company shall ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
- (7) The Company shall develop best practices to make available transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.



- (8) The Company shall handle all the unpublished price sensitive information on a need-to-know basis. No unpublished price sensitive information shall be communicated by such personnel to any other person except in furtherance of legitimate purposes, his/her performance of duties or discharge of his/her legal obligations.
- (9) Policy for determination of 'Legitimate Purposes' - The sharing of 'unpublished price sensitive information' (UPSI) shall be deemed to be for "Legitimate Purpose" if it satisfied the following criteria:
- (i) The 'Legitimate Purpose' shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
  - (ii) The information shall be shared with any person on 'need to know' basis.
  - (iii) Insiders shall share the UPSI with the external agencies only in the interest of the Company and/or in compliance with the requirements of the law.
  - (iv) The agreements entered into involving sharing of UPSI should have a "confidentiality clause" or else a separate Non-Disclosure Agreement shall be executed with parties to safeguard the disclosure of UPSI.