



SHREE AJIT PULP AND PAPER LIMITED
CODE OF PRACTICE AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

This Code is called Shree Ajit Pulp and Paper Limited Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) and is framed based on the principles of fair disclosure outlined in the SEBI (Prohibition of Insider Trading) Regulations, 2015 further amended with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (hereafter referred (“SEBI (PIT) Regulations”). This revised policy shall come in to effect from 1st April, 2019.

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery of the securities of the Company no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary and Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 The Company shall make prompt dissemination of any unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.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 The Company shall handle all unpublished price sensitive information on a need-to-know basis.
9. Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisers, insolvency professionals, other advisers and consultants shall be considered as “legitimate purposes” for the purpose of sharing unpublished price sensitive information in the ordinary course of Business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibition of SEBI (PIT) Regulations.

10. A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the permanent Account Number or any other identifier authorized by law where permanent account number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.

11. Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for the purpose of SEBI (PIT) Regulations and such person is also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI (PIT) Regulations.

The Board shall have power to amend any of the provisions of this policy, substitute any of the provisions with a new provision or replace this policy entirely with a new policy according to subsequent modification(s)/amendment(s) to regulation.

This Policy has been approved and adopted by Board of Directors at its meeting held on 25/03/2019.