APCOTEX INDUSTRIES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION OF APCOTEX INDUSTRIES LIMITED (APCOTEX)

THIS CODE IS FRAMED UNDER REGULATION 8 (1) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

The Principles of Fair Disclosure adopted by APCOTEX are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.

2. To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.

3. Company Secretary is designated as Chief Investor Relations Officer to take all required action for dissemination of information and disclosure of unpublished price sensitive information indiscriminately.

4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.

5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website www.apcotex.com to ensure official confirmation and documentation of disclosures made therein.

8. To handle all unpublished price sensitive information on a need-to-know basis only.