

MYSORE PETRO CHEMICALS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of Mysore Petro Chemicals Limited (“the Company”) has adopted the Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information which is now being modified with the notification of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

For the purpose of this Policy, ‘Unpublished Price Sensitive Information’ shall mean any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- i. financial results;
- ii. dividends;
- iii. change in capital structure;
- iv. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- v. changes in key managerial personnel.

No Unpublished Price Sensitive Information to shall be communicated to any person except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations and on a need to know basis.

The term “legitimate purpose” referred above shall mean and include:

- i. Sharing of unpublished price sensitive information in the ordinary course of business by an employee with the lenders, customers, suppliers, legal advisors, auditors, research analysts or other advisors or consultants
- ii. Sharing of information with the statutory authorities in compliance with the order of any court or competent authority
- iii. Sharing of information by any employees within the Company strictly on a need to know basis, performance of duties or discharge of legal obligations.

Provided that such sharing of information has not been carried out to evade or circumvent the prohibitions of these regulations.

Guidelines for dissemination and preservation of Unpublished Price Sensitive Information:

The Company shall be governed by the following guidelines –

- Promptly disclose any Unpublished Price Sensitive Information that would impact the price of securities by informing to the stock exchanges and publishing the same at the Company's website www.mysorepetro.com
- Ensure uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- Ensure that in the event any Unpublished Price Sensitive Information is selectively or inadvertently disclosed, the same shall immediately be made public.
- Ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
- Promptly send an appropriate and fair response to queries on news report and requests for verification of market rumours by regulatory authorities.
- Maintain and promptly publish on its website transcripts or records of proceedings of meetings with analysts or other investors to ensure official confirmation and documentation of disclosures made.
- The Company Secretary & Compliance Officer of the Company shall act as the Chief Investor Relations Officer of the Company who shall administer the Code to ensure its implementation.