

HATSUN AGRO PRODUCT LIMITED

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

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

Adopted by the Board of Directors on 28th May 2015

INTRODUCTION:-

- A. SEBI vide its Circular No. LD-NRO/ GN/ 2014-15/21/85 dated 15th January 2015 has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15th May 2015.
- B. Regulation 8 contained under Chapter IV of SEBI (Prohibition of Insider Trading) Regulations, 2015 mandates listed companies to formulate a **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as "Code")**
- C. The Company endeavours to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent misuse of such information, in compliance with the aforesaid SEBI Regulations hereby notifies this Code.
- D. This Code is applicable upon the Members of the Board of Directors of the Company with effect from 15th May 2015.
- E. Any modifications and/or amendments brought about by SEBI subsequently shall automatically apply to this Code.

CODE OF FAIR DISCLOSURE:-

The Code of Fair Disclosure adopted by HATSUN are as follows:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall ensure to make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed to avoid selective disclosure of unpublished price sensitive information.
3. The Company Secretary / Compliance Officer shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
7. The Company shall publish proceedings of meetings held if any with analysts and of other investor relations conferences on its official website www.hatsun.com to ensure official confirmation and documentation of disclosures made therein.
8. The Company shall handle all unpublished price sensitive information on a need-to-know basis only.

AMENDMENTS :-

The Managing Director of the Company, subject to approval of the Board, is authorised to amend or modify this Code in whole or in part. The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information. This Code shall be published on the official web site of the Company. This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.