



Astral Poly Technik Limited

*Code of Practice and Procedures for fair disclosure of unpublished
price sensitive information*

*(Pursuant to Reg. 8(1), Chapter - IV of the SEBI (Prohibition of
Insider trading) Regulations, 2015)*

(This Code shall be effective from 1st April, 2019)

1. **Preamble:**

- 1.1 Securities and Exchange Board of India (SEBI), as part of its continuing efforts to protect the interests of investors in general, revised regulations for prohibition of Insider Trading and has issued new regulations viz. the SEBI (Prohibition of Insider Trading) Regulations, 2015, applicable to all listed companies. These Regulations came into force with effect from 15th May, 2015. The Company intends to follow best practices, duly compliant with Applicable Law, in the matter of disclosure of UPSI. Accordingly, the following Code was adopted by the Board of Directors of the Astral Poly Technik Limited. Further in view of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 effective from 1st April, 2019, the Code has been amended by the Board of Directors and the revised Code shall be effective from 1st April, 2019.
- 1.2 It is mandatory in terms of the Regulations for every listed company/entity to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. To comply with the said requirement, the Board of Directors hereby adopts this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

2. **Code of fair disclosure :**

- 2.1 Astral Poly Technik Limited ("The Company") endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations in force. Towards achieving this objective, the Company shall adhere to the following principles of fair disclosure of unpublished price sensitive information in letter as well as in spirit.

- i. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such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.
- ii. The Company shall ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- iii. The Company Secretary of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- vi. The Company will ensure that information shared with analysts and research personnel, if any, is not an unpublished price sensitive information.
- vii. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the Company's website to ensure official confirmation and documentation of disclosures made

- viii. The Company shall handle of all unpublished price sensitive information on a need to- know basis.
 - ix. The Company Shall Share the information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or 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 prohibitions of the PIT regulations.
 - x. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of SEBI (Prohibition of Insider Trading) Regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI (Prohibition of Insider Trading) Regulations.
3. This Code shall be published on the official web site of the Company.
 4. 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.