



CODE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. PREAMBLE

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") has been formulated by **ATHARVA POLY-PLAST LIMITED** ("Company") pursuant to Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations").

The objective of this Code is to ensure fair, timely and adequate disclosure of unpublished price sensitive information ("UPSI") by the Company and to ensure that such information is disseminated uniformly and promptly to all stakeholders.

This Code shall be read together with the Company's Code of Conduct for regulating, monitoring and reporting of trading by Designated Persons and their immediate relatives framed under Regulation 9 of the SEBI PIT Regulations.

2. OBJECTIVE

The objective of this Code is to:

- a) ensure prompt public disclosure of UPSI that would impact price discovery;
- b) ensure uniform and universal dissemination of UPSI;
- c) prevent selective disclosure of UPSI;
- d) provide appropriate mechanisms for dealing with accidental or inadvertent disclosure of UPSI;
- e) establish appropriate procedures for responding to market rumours; and
- f) ensure that UPSI is handled strictly on a need-to-know basis and in accordance with applicable laws.

3. DEFINITIONS

Unless the context otherwise requires:

"Company" means **ATHARVA POLY-PLAST LIMITED**

"Compliance Officer" means the officer designated by the Company for the purpose of administering the SEBI PIT Regulations and this Code.

"Generally Available Information" means information that is accessible to the public on a non-discriminatory basis.



“Unpublished Price Sensitive Information” or “UPSI” shall have the meaning assigned to it under the SEBI PIT Regulations and includes any information relating to the Company or its securities, directly or indirectly, that is not generally available and which upon becoming generally available is likely to materially affect the price of the securities.

4. PRINCIPLES OF FAIR DISCLOSURE

The Company shall adhere to the following principles:

4.1 Prompt Disclosure

The Company shall make prompt disclosure of UPSI to the stock exchange(s) and/or through other appropriate public channels, as applicable, so as to make such information generally available.

4.2 Uniform and Universal Dissemination

The Company shall ensure uniform and universal dissemination of UPSI and shall avoid selective disclosure of UPSI.

4.3 Appointment of Chief Investor Relations Officer

The Company shall designate Compliance Officer as the Chief Investor Relations Officer (“CIRO”) who shall be responsible for dissemination of information and disclosure of UPSI.

The CIRO shall be responsible for ensuring that information disclosed by the Company is accurate, timely, consistent and in compliance with applicable laws and regulations.

4.4 Prompt Dissemination of Selective Disclosure

In case any UPSI is inadvertently or selectively disclosed to any person or group of persons, the Company shall take reasonable steps to promptly make such information generally available to the public.

4.5 Appropriate and Accurate Response to Market Rumours

The Company shall appropriately deal with market rumours in accordance with applicable provisions of the SEBI PIT Regulations and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”), as applicable.

The Company shall endeavour to provide appropriate clarification or confirmation to the stock exchange(s), wherever required.

4.6 Disclosure to Analysts and Research Personnel



The Company shall ensure that there is no selective disclosure of UPSI to analysts, institutional investors, research personnel or any other person.

Information shared with analysts or research personnel shall be generally available information or information that is otherwise permitted to be shared under applicable laws.

4.7 Handling of Unanticipated Questions

The Company shall ensure that any response to questions raised by analysts, investors, shareholders or other stakeholders does not inadvertently disclose UPSI.

Where a question requires disclosure of UPSI, the Company shall follow the applicable disclosure procedures before providing such information.

4.8 Need-to-Know Basis

UPSI shall be shared only on a need-to-know basis and only for legitimate purposes, performance of duties or discharge of legal obligations.

Persons receiving UPSI shall be informed of their obligation to maintain confidentiality and shall not use such information for trading in securities of the Company.

5. PROCEDURE FOR DISCLOSURE OF UPSI

The following procedure shall be followed for disclosure of UPSI:

- a) The person becoming aware of UPSI shall immediately inform the Compliance Officer/CIRO.
- b) The Compliance Officer/CIRO shall evaluate the information and determine the appropriate course of action in consultation with the Managing Director/Whole-time Director/Company Secretary, as applicable.
- c) Where disclosure is required, the Company shall make the disclosure to the stock exchange(s) and/or through other appropriate public channels in accordance with applicable laws.
- d) The information shall, wherever applicable, be simultaneously placed on the Company's official website.
- e) The Company shall endeavour to ensure that the information is disseminated in a manner that provides equal and timely access to all stakeholders.



6. LEGITIMATE PURPOSE

UPSI may be communicated, provided, allowed access to or procured for a legitimate purpose in accordance with the SEBI PIT Regulations.

Persons who receive UPSI for legitimate purposes shall be considered insiders for the purpose of the SEBI PIT Regulations and shall be required to maintain confidentiality of such UPSI.

The Company shall maintain appropriate records of persons with whom UPSI is shared, wherever required under applicable law.

7. MAINTENANCE OF CONFIDENTIALITY

All Directors, Key Managerial Personnel, employees, advisors, consultants, auditors, legal advisors, intermediaries and other persons who receive UPSI shall:

- a) maintain confidentiality of UPSI;
- b) use UPSI only for the purpose for which it has been communicated;
- c) not communicate UPSI to any unauthorised person;
- d) not trade in the securities of the Company while in possession of UPSI; and
- e) comply with the SEBI PIT Regulations and the Company's Code of Conduct.

8. DIGITAL AND ELECTRONIC COMMUNICATION

The Company shall exercise due care while communicating information through:

- e-mail;
- telephone/video conferences;
- investor meetings;
- presentations;
- social media;
- Company's website; and
- other electronic communication channels.

Care shall be taken to ensure that UPSI is not inadvertently disclosed through such communication.

9. INVESTOR MEETINGS AND CONFERENCES



The Company shall follow the principles of fair disclosure while conducting investor meetings, analyst meets, conference calls and other interactions with investors or market participants.

Where reasonably practicable, presentations and other relevant material used during investor/analyst meetings shall be made available on the Company's website and/or through the stock exchange(s), as applicable.

10. ACCIDENTAL OR INADVERTENT DISCLOSURE

In case of accidental or inadvertent disclosure of UPSI:

- a) the person responsible for such disclosure shall immediately inform the Compliance Officer/CIRO;
- b) the Compliance Officer/CIRO shall assess the nature and extent of the disclosure;
- c) the Company shall take appropriate steps to disseminate the information to the public as soon as reasonably practicable; and
- d) appropriate corrective and preventive measures shall be taken to avoid recurrence.

11. ROLE OF COMPLIANCE OFFICER / CIRO

The Compliance Officer/CIRO shall:

- a) administer and monitor compliance with this Code;
- b) coordinate with the stock exchange(s) for required disclosures;
- c) oversee dissemination of UPSI;
- d) ensure that selective disclosure of UPSI is avoided;
- e) maintain appropriate records relating to disclosure of UPSI;
- f) coordinate responses to market rumours and investor queries, as applicable; and
- g) Perform such other functions as may be prescribed under applicable laws.

12. WEBSITE DISCLOSURE

This Code shall be hosted on the official website of the Company.

Any amendment to this Code shall also be promptly updated on the Company's website.

The Company shall comply with applicable requirements for confirmation/intimation of the Code to the stock exchange(s).



13. AMENDMENT

The Board of Directors may amend, modify or revise this Code from time to time to ensure compliance with amendments to the SEBI PIT Regulations, SEBI LODR Regulations, circulars, notifications, directions or other applicable laws.

In case of any inconsistency between this Code and applicable statutory or regulatory provisions, the statutory or regulatory provisions shall prevail.

14. EFFECTIVE DATE

This Code shall be effective and remain in force until amended or replaced by the Board of Directors.

For ATHARVA POLY-PLAST LIMITED

Sd/-

ANUJIT SHIVAJI DARADE

Managing Director

DIN: 02237278