Southern Petrochemical Industries Corporation Limited
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Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to Regulation 8 of the SEBI (Prevention of Insider Trading) Regulations, 2015)

The following is the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Southern Petrochemical Industries Corporation Limited, (SPIC), consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the terms used herein shall have the same meaning as given in the said Regulations:

The following are the principles of Fair Disclosure adopted by SPIC:

1. Unpublished price sensitive information (UPSI) that would impact price discovery will be intimated to the Stock Exchanges immediately on any such credible and concrete information crystalizing or coming into the knowledge of the Company.

2. SPIC will ensure that there is no selective disclosure of any UPSI.

3. The Whole-time Director of the Company has been designated as the Chief Investor Relations Officer (CIRO) for the purpose of determining the information and timing of dissemination of any UPSI.

4. In case any UPSI gets disclosed inadvertently to any select persons or group of persons in the ordinary course, the CIRO will immediately take steps for disclosing such information to the Stock Exchanges and also the website of the Company.

5. SPIC will provide prompt and appropriate response to queries on news reports and verification of market rumours by regulatory authorities.

6. All the functional heads and other senior executives of the Company will ensure that:

    a. The information shared with analysts and research personnel are not UPSI. They will seek guidance from the CIRO and the Company Secretary in case it is not clear to them if any of the proposed disclosure to such analysts and research personnel would be a UPSI.

    b. The proceedings are captured aptly and the details of disclosures made are uploaded in the website of the Company

c. Share all the UPSI with the concerned personnel strictly on a need to know basis.

d. Keep all internal presentations and other documents relating to business plans and other related activities as classified documents and not discuss such information in public or with persons not concerned with the proposal.

e. Appropriate non-disclosure agreements are signed by the advisors, consultants, etc. who are engaged for advising on major business plans and similar proposals, which have not otherwise been made public

The above Code has been duly approved by the Board of Directors.