

INDO BORAX & CHEMICALS LIMITED
CODE OF PRACTICE AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION

1. Preamble:

Pursuant to the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Listed Companies to frame a Code of Practices and Procedures for fair disclosures of Unpublished Price Sensitive Information.

2. Definitions:

"Unpublished Price Sensitive Information" ("UPSI") means any information, relating to a company or its securities, directly or indirectly, that is not generally available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, delisting, disposals and expansion of business and such other transactions;
- v. change in key managerial personnel; and
- vi. material events in accordance with the listing agreement.

3. Code:

The Principles of Fair Disclosures:

1. Prompt public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available;
2. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure;
3. The senior office of the company shall act as Chief Investor Relation Officer to deal with dissemination of information and disclosure of UPSI;
4. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities;
6. The information shared with analysts and research personnel is not Unpublished Price Sensitive Information;
7. Develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made;
8. Handling of all Unpublished Price Sensitive Information on a need-to-know basis.