CODE OF PRACTICES

AND

PROCEDURES

FOR

FAIR DISCLOSURE

OF

UNPUBLISHED PRICE SENSITIVE INFORMATION

OF

SHARDA CROPCHEM LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Introduction & Scope:

Pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations"), as amended from time to time, the Company is required to formulate a code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Fair Disclosure Code").

This Code ensures timely and adequate disclosure of UPSI which would impact the price of its securities and to maintain uniformity, transparency and fairness in dealing with all its stakeholders.

The Company believes in adopting, practising and upholding the highest standards of professionalism, honesty, integrity and ethical behaviour in order to prohibit and prevent insider trading in the Company's securities. Towards this end, the company has formulated a Code of Conduct to be followed by its directors, employees and advisers, consultants and retainers who, in the opinion of the Company, may have access to price sensitive information (hereinafter referred to as "Designated Persons").

Legitimate Purpose:

For the purpose of complying with SEBI (Prohibition of Insider Trading) Regulations, 2015, the term 'Legitimate Purpose' shall includes sharing of unpublished price sensitive information by an insider with holding Company, subsidiary companies, associates companies, companies in the same group as the Company, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal, business and other professional advisors and consultants, auditors, company secretaries, chartered accountants and cost and management accountants in practice and insolvency professionals, in the ordinary course of business, or for the purpose of:

- Furtherance of the Company's business; or
- Furtherance of the Company's business or corporate objectives; or

- Compliance with regulatory or other requirements in the country or any other country where the Company or the recipient of information operates

Provided that such sharing is not carried out to evade or circumvent prohibition laid down by the Regulations.

Any person in receipt of unpublished price sensitive information pursuant to a 'legitimate purpose' shall be considered as an 'insider'. Further, a notice shall be served to the recipient of the unpublished price sensitive information informing the recipient to maintain confidentiality of such unpublished price sensitive information.

Principles and Procedures for fair disclosure:

The Company adopts principles and procedures as under to ensure fair disclosure of unpublished price sensitive information and undertakes to follow the same:

1. The company shall make prompt public disclosure of unpublished price sensitive information (hereinafter referred to as '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. The Company shall ensure uniform and universal dissemination of UPSI to avoid any selective disclosure of such information.

3. The Company designates its 'Company Secretary' as its Chief Investor Relations Officer and entrusts him with the function of dissemination and disclosure of UPSI.

4. The Company shall make prompt dissemination of UPSI 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 Company shall ensure that no UPSI is shared with analysts and researchers on selective basis.

7. The Company shall develop best practices to make transcript 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. The Company shall handle all UPSI on a need-to-know basis.