

## **CODE FOR PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

### **PURPOSE:**

The Company is committed to making factual, accurate and a timely disclosure based on applicable legal and regulatory requirements, and in furtherance of the same, has formulated this Code of Corporate Fair Disclosure Practices for Prevention of Insider Trading (the "Code").

The purpose of this Code is to formulate a stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Securities of CKP Products Limited (the "Company") and clearly outline the procedures and practical guidelines that would be followed by the Company for consistent, transparent, regular and timely public disclosure and dissemination of Unpublished Price Sensitive Information or such other information as required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

This Code is meant to enable all persons investing in the securities of the Company to have an equal and timely opportunity to access such information that may affect their investment decisions regarding the securities of the Company.

### **APPLICABILITY:**

This Code shall be applicable and binding on all the employees, directors and such other persons authorized to speak on behalf of the Company. This Code was formulated by the board on May 15, 2015. Pursuant to the notification of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Code has been amended and reviewed by the Board on March 30, 2019. This Code shall come into effect from April 1, 2019.

### **CHIEF INVESTOR RELATIONS OFFICER:**

The Chief Executive Officer of the Company who is also designated as the Corporate Disclosure Officer (CDO) to oversee corporate disclosure will be the Chief Investor Relations Officer ("CIO") to deal with dissemination of information and disclosure of UPSI.

### **PROMPT DISCLOSURE OF PRICE SENSITIVE INFORMATION:**

- Disclosure of Unpublished Price Sensitive Information, as defined under the Securities and Exchange Board of India (Prevention of Insider Trading) Regulations, 2015 ("SEBI Insider Trading Regulations") ("UPSI") would be done promptly when credible and concrete information is available for making the same generally available;

- The Company will endeavour to make uniform and universal dissemination of UPSI and will avoid making selective disclosure once the information is ready to be made generally available. Material events will be disseminated as mandated by the stock exchanges in Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI LODR Regulations”), as amended from time to time.
- In case the Company is required to make selective disclosure of UPSI, then the information will be promptly disseminated either in the form of notification to stock exchanges, press releases or upload of information on the website of the Company.
- UPSI handling will be on a need to know basis for legitimate purposes only.
- The information released to stock exchanges will also be published in the website of the Company for investor access to the public announcements.

#### **DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI):**

Unpublished Price Sensitive Information” means any information, relating to the 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:

- a) financial results;
- b) dividends;
- c) change in capital structure;
- d) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- e) any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company
- f) changes in key managerial personnel; and
- g) material events in accordance with the Listing Agreement

The following principles shall be followed at all times in relation to any disclosure of Unpublished Price Sensitive Information at any forum pursuant to the requirements of the Code or applicable laws:

1. 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.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.

3. The chief investor relations officer along with the CFO and CS of the Company to deal with dissemination of information and disclosure of unpublished price sensitive information.
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 rumors by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing 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.
9. Any person in receipt of unpublished price sensitive information pursuant to "Legitimate Purpose" shall be considered as "insider" for purposes of PIT regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

**POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES:**

Any Unpublished Price Sensitive Information shall only be shared in furtherance of legitimate purpose(s), performance of duties or discharge of legal obligations. The term "legitimate purposes" shall be construed in accordance with the following principles:

1. Sharing of Unpublished Price Sensitive Information in the ordinary course of business by any employee, insider, or by any authorized person with existing or proposed partners, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.
2. Sharing of Unpublished Price Sensitive Information for any other genuine or reasonable purpose as may be determined by the CEO or CIRO or Company Secretary.

3. Sharing of Unpublished Price Sensitive Information with a court of law or any governmental authority or a regulatory body on the basis of any order issued by them.
4. Sharing of Unpublished Price Sensitive Information for any other purpose as may be prescribed under Regulations formulated by SEBI or the Companies Act, 2013 and Rules thereunder or any other law for the time being in force, as may be amended from time to time.

**AMENDMENT AND MODIFICATIONS:**

This Code shall be reviewed annually/ from time to time and any amendments or modifications thereto shall be subject to the review and approval of the Board. In the event that any provision of this Code conflicts with any law, rule or regulation that is in force for the time being, the said law, rule or regulation that is in force for the time being shall take precedence over the conflicting provision of the Code. However, such conflict between the provisions of the Code and any law, rule or regulation that is in force for the time being shall in no way affect or impair the validity, legality and enforceability of the remaining provisions of the Code.