



Axel Polymers Limited

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AXEL POLYMERS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

Effective from 01.02.2016

A code of practices and procedures for fair disclosure of UPSI for adhering each of the principles is set out below:

1. Prompt public disclosure of 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. UPSI shall not be disseminated selectively but it should be disseminated uniformly and universally.
3. Designated Managing Director or Company Secretary, to deal with dissemination of information and disclosure of UPSI.
4. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall give 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 UPSI.
7. Developing best practices to make transcripts or records of proceedings of meetings on the official website to ensure official confirmation and documentation of disclosures made.
8. All UPSI shall be handled on a need-to-know basis.

For Axel Polymers Limited,

A.B. Bodhanwala
Managing Director
DIN: 00421362
