



Sree Rayalaseema Alkalies

and Allied Chemicals Ltd., CIN : L24110AP1981PLC003077

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

INTRODUCTION:

In order to comply with the mandatory requirement of the Regulations notified by SEBI on 15.01.2015 to be effective from 15.05.2015, it is necessary to formulate a specific Code of Fair Disclosure for Sree Rayalaseema Alkalies and Allied Chemicals Limited for use by its Promoters, Directors, Officers, Employees, connected persons.

These documents embodies the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) to be adopted by the Company and followed by its Directors, KMP, Senior Management level, all Executives in Finance and Secretarial Dept. and Connected Persons. The code seems to ensure timely, fair and adequate disclosure of price sensitive information to the investor community by the Company to enable them to take informed investment decisions with regard to the Company's Securities.

CODE OF FAIR DISCLOSURE OF UPSI (UNPUBLISHED PRICE SENSITIVE INFORMATION):

The Board of Directors of Sree Rayalaseema Alkalies and Allied Chemicals Limited have always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. Towards achieving this objective, the Company and the members of the Board, KMP (Key Managerial persons, i.e. MD, CEO, CFO and Company Secretary), Senior Officers, Executives in Finance and Secretarial Department and connected persons shall adhere to the following principles of fair disclosure of unpublished price sensitive information in letter as well as in spirit.

1. The Company shall ensure 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. The Company shall ensure Uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.



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4. The Company shall make prompt dissemination of published price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel, if any, is not UPSI.
7. The Company shall develop and follow 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. The Company shall handle of all UPSI on a need to know basis.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information.

This Code shall be published on the official web site of the Company for which necessary steps will be taken by the Company Secretary.

This Code has been adopted by the Board of Directors of Sree Rayalaseema Alkalies and Allied Chemicals Limited in its meeting held on 07.05.2015 and shall be deemed to have come into force from 15th May, 2015. Subsequent modification(s) / amendment(s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.