

**CODE OF PRACTICES AND PROCEDURES FOR  
FAIR DISCLOSURE OF UNPUBLISHED PRICE  
SENSITIVE INFORMATION OF SUMUKA AGRO  
INDUSTRIES LIMITED**

**1. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

1.1 A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

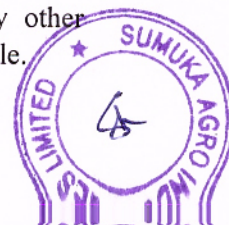
- The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- The Company shall ensure that there is uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- Chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company shall appropriately and fairly respond to queries on news reports and requests for verification of market rumours by regulatory authorities.
- Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
- 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.
- Unpublished Price Sensitive Information shall be handled on a "need to know" basis i.e. unpublished Price Sensitive Information shall be disclosed only to those where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

**2. Policy for determination of "Legitimate Purpose"**

2.1 "Legitimate Purpose" of sharing of unpublished price sensitive information shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

2.2 Any person in receipt of unpublished price sensitive information pursuant to a "Legitimate Purpose" shall be considered an "insider" for purposes of this Code and the Regulations and due notice shall be given to such persons by the Compliance Officer and/ or the person sharing such information to maintain confidentiality of such unpublished price sensitive information in compliance with this Code and the regulations.

2.3 A Structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for Legitimate Purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.



- 2.4 Adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

**3. Disclosure of Code on Public Domain**

This Code and any amendment thereof will be published on the Company's website [www.sumukaagro.com](http://www.sumukaagro.com)

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