



**RELIANCE
CHEMOTEX**
INDUSTRIES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Version Control		
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3.	Board of Directors	29 May 2026

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

INFORMATION

1. Preamble:

The Securities and Exchange Board of India (“SEBI”) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) on January 15, 2015, which is effective from May 15, 2015. Pursuant to Regulation 8 of the Regulations, Reliance Chemotex Industries Ltd (herein after call” RCIL”) is required to formulate a code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Fair Disclosure Code”). Accordingly a Code of Practices and procedure for fair disclosure of Unpublished Price Sensitive Information was formulated by the Company.

2. Applicability:

This code shall be applicable and binding on the designated persons as defined in the SEBI (Prohibition of Insider Trading) Regulations, 2015 and as amended from time to time.

3. Scope:

- 3.1 RCIL endeavors to preserve the confidentiality of unpublished price sensitive information (UPSI) and to prevent its misuse. To achieve these objectives, and in compliance with the aforesaid Regulations, RCIL has adopted this Fair Disclosure Code.
- 3.2 This Code ensures timely and adequate disclosure of unpublished Price Sensitive Information which would impact the price of its securities and to maintain uniformity, transparency and fairness in dealing with all its stakeholders.
- 3.3 RCIL is committed to timely and accurate disclosure based on applicable legal and regulatory requirements.

4. Principles of Fair Disclosure:

To adhere to the principles as mentioned in Schedule A to the Regulations, RCIL shall ensure the following:

- 4.1 The Company shall ensure prompt disclosure of Unpublished Price Sensitive Information (here in referred after “UPSI”) with the Stock Exchange where the Securities of the Company are listed.

- 4.2 The Company shall make uniform and universal dissemination of UPSI to avoid selective disclosure. Upon the information being submitted with the Stock Exchange, the information shall be deemed to be generally available shall no longer be treated as UPSI.
- 4.3 The Company Secretary & Compliance Officer is the Chief Investor Relation Officer for the purpose of aforesaid SEBI Regulation and to deal with the dissemination of information and disclosure of UPSI. In the absence of the Company Secretary, such other officer as may be authorized by the Board.
- 4.4 The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 4.5 The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors by Regulatory Authorities such as Stock Exchanges, etc.
- 4.6 Ensure that information shared with analysts and research personnel is not UPSI.
- 4.7 The Company shall adopt best Practices to make transcripts or record of proceeding of meeting with analyst and other investor relations conference on the official website to ensure official confirmation and documentation of disclosure made.

Details relating to quarterly performance and financial results are disseminated to the shareholders through the press releases and uploaded on the Company's website.

- 4.8 The Company shall ensure handling of all UPSI on a "need to know basis" basis only.

Policy for determination of "Legitimate purposes"

The sharing of UPSI shall be deemed to be for "Legitimate Purpose" if it satisfies the following criteria:

- i. **"Legitimate purpose"** 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 prohibition of these regulations.
- ii. The information shall be shared with any person on 'need to know' basis.
- iii. Insiders shall share the UPSI with the external agencies only in the interest of the
- iv. Company and/or in compliance with the requirements of the law.
- v. Sharing of information may be construed as insider trading even while it is in pursuit of compliances required or business interests of the Company in appropriate circumstances.

The person who has the UPSI should ideally recuse himself from assigned task of the sharing the UPSI with third parties in such doubtful cases to avoid any adverse inferences in this regard.

- vi. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "Insider" and due notice shall be given to such person to maintain confidentiality of UPSI in compliance with the Regulations. The Chief Investor Relations Officer shall ensure that such third party with whom the UPSI is shared, is also bound by non-disclosure or confidentiality agreements and the liabilities involved which shall mention the duties and responsibilities of such person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of the Code or Regulations.

The Company shall enter the details of the person/s or entity/ies with whom UPSI is shared pursuant to the legitimate purpose in the Structured Digital database which shall include the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping to ensure non-tampering of the database.