



## **CODE OF PRACTICES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR THE PREVENTION OF INSIDER TRADING**

### **INTRODUCTION :**

The Board of Directors ('the Board') of CHORDIA FOOD PRODUCTS LIMITED / the Company') in its Meeting held on Wednesday, 11<sup>th</sup> November, 2020 has adopted the 'Policy for Determination of Material Events or Information' as required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as 'Listing Regulations' 2015).

### **POLICY OBJECTIVE:**

The objective of the Policy is to ensure timely and adequate disclosure of material events or information as per Regulation 30 of the Listing Regulations 2015.

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time (hereinafter referred to as "the Regulations"), have been laid down to prevent "Insider Trading". "Insider Trading" takes place when any person who is or was connected with the Company or deemed to have been connected with the Company and who has or can be reasonably expected to have access to Unpublished Price Sensitive Information (UPSI), deals in the securities of the Company on the basis of the Unpublished Price Sensitive information, informs, communicates, counsels or procures any Unpublished Price Sensitive information to any person should not deal in securities of the Company while in possession of such UPSI. Such dealings may tend to cause the Insider to unfairly gain or unfairly avoid losses vis-à-vis the ordinary investors.

### **Code of Fair Disclosure:**

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such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.
2. The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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.

### **CHORDIA FOOD PRODUCTS LTD.**

**Office:** Above S. K. Agencies, 38/39, Tarkar Compound, Hadapsar Industrial Estate, Hadapsar, Pune-411 013,  
**Tel.:** 020-26871500 **Website:** www.chordiafoods.com

**Registered Office:** 399/400, Sangavi (Shirwal), Tal. Khandala, Dist. Satara-412801  
**Tel.:** 9922990065 **CIN :** L15995PN1982PLC026173

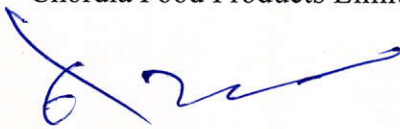


5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
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 unpublished price sensitive information on need-to-know basis.

### **Determination of Legitimate Purpose**

The term "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 prohibitions of these regulations.

By order of the Board of  
Chordia Food Products Limited



Babu Gavhane  
Executive Director & CFO



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