



ADF FOODS LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

[Pursuant to Regulation 8(1) and Schedule A of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Objective

ADF FOODS LIMITED (“the Company”) is a listed Company. The shares of the Company are listed on National Stock Exchange of India Limited (NSE) and BSE Limited (BSE). The Securities and Exchange Board of India (SEBI) has enacted the new Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The said Regulations mandates all listed Company to formulate a policy on the Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of ‘Unpublished Price Sensitive Information’ (UPSI).

2. Scope

The Code governs the practices and procedures to be followed by the Company for fair disclosure of Unpublished Price Sensitive Information. The Code shall be disclosed to Stock Exchanges and shall also be posted on the Company’s website.

3. Approval

This Code has been approved by the Board of Directors of the Company on May 13, 2015.

4. Code

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

1. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery, no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. The Managing Director of the Company shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
4. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Company will provide, appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensure that the information, if any, shared with analysts and research personnel is not Unpublished Price Sensitive Information.
7. The Company will handle all Unpublished Price Sensitive Information on a need-to-know basis and for legitimate purpose only.

5. Enforcement

This Code will come into force effective from May 15, 2015, as approved by the Board of Directors of the Company.
