DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM Shriram Fine Chemicals Limited

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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

A. OBJECTIVE OF THE CODE

The objective of this code called 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' (the '**Fair Disclosure Code**') is to:

- ensure fair and prompt public disclosure of Unpublished Price Sensitive Information by DCM Shriram Fine Chemicals Limited, which would impact the price of the Company's securities

- maintain uniformity, transparency and fairness in dealing with all stakeholders, and

- ensuring adherence to applicable laws and regulations.

B. DEFINITIONS

'**Regulations'** means the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;

'**Board'** means Board of Directors of the Company;

'Compliance **Officer'** for the purpose of this Code mans the Company Secretary. In the absence of Company Secretary, the Board of Directors may authorize such other officer of the Company to discharge the duties of Compliance Officer under the Regulations;

'**Unpublished Price Sensitive Information'** or '**UPSI'** means any information as defined in the Regulations or any amendments thereto, relating to a company or its securities, directly or indirectly, that is not generally available which upon

becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

(i) financial results

(ii) dividends

(iii) change in capital structure

(iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions

(v) changes in Key Managerial Personnel other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor

(vi) change in rating(s), other than ESG rating(s)

(vii) fund raising proposed to be undertaken

(viii) agreements, by whatever name called, which may impact the management or control of the Company.

(ix) fraud or defaults by the Company, its Promoter, Director, Key Managerial Personnel, or Subsidiary or arrest of Key Managerial Personnel, Promoter or Director of the Company, whether occurred within India or abroad

(x) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from Banks/Financial Institutions

(xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016

(xii) initiation of forensic audit, by whatever name called, by the Company or any other entity for detecting misstatement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report.

Words not defined in this Fair Disclosure Code shall have the meaning ascribed to them in the Regulations.

C. PRICIPLES OF FAIR DISCLOSURE

C1. Prompt disclosure of UPSI

The Company has adopted a Policy for Determination of Materiality of Events/Information for Disclosure to Stock Exchanges (Policy) in line with

Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time. The Policy defines Material Events & Material Information for disclosure to Stock Exchanges.

The Company shall make prompt public disclosure of UPSI that would impact price discovery shall be done no sooner than credible and concrete information comes into being in order to make such information generally available.

Material Information- Material Information shall mean Material Events meeting the requirements of the Policy. When a Material event or Material Information triggers disclosure, the Company shall promptly furnish the Material Information to all stock exchanges where its Securities are listed. Information published on the website of a stock exchange, would ordinarily be considered generally available information. The information released by the Company to the stock exchanges is also to be hosted on the Company website https://dsfcl.com/

C2. Overseeing and Coordinating Disclosure

The prime responsibility for overseeing and disclosure in the Company shall be on the Company Secretary as nominated by the Managing Director from time to time. The Company Secretary shall deal with the dissemination of information and disclosure of UPSI in-coordination with the CFO. The Company has designated Ms. Kokila Arora to deal with dissemination of information and disclosure of UPSI, to the extent desired. Her e-mail ID is kokilaarora@dsfcl.com.

C3. Interactions with Analysts & Investors

In order to maintain a transparent and effective two-way communication between a Company, the financial community, the Management shall interact with equity research analysts, investors and other members of the investing community from time to time. The Company shall develop 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.

During these interactions, the Company will ensure that no UPSI is disclosed selectively to any one or group of research analysts or investors, to the disadvantage of other stakeholders. The Company shall ensure that the

following guidelines are followed while dealing with analysts and institutional investors:

Handling of unanticipated questions

The Company shall promptly and carefully deal with analysts' questions that raise material issues outside the intended scope of discussion. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes UPSI, a public announcement shall be made before responding.

Medium of disclosure/dissemination

Disclosure and dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination. All disclosures to the stock exchanges must be made promptly.

Company's website

The Company's website www.dauralaorganics.com may provide a means of giving a direct access to analyst briefing material, significant background information and questions and answers.

C4. Prompt Dissemination of UPSI that is disclosed selectively

In the event of selective disclosure of UPSI, inadvertently or otherwise, the Company shall promptly disseminate the same as per Clause C3 above in order to make such information generally available.

CIRO shall respond promptly and fairly upon learning of the selective disclosure. In this context, rumors or media speculation (including quotes of unnamed persons) shall not be considered as selective disclosure.

Exception: Sharing of UPSI by an Insider to any person including other Insiders in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

C5. Response to Regulatory Authorities

The Company shall respond appropriately and fairly to queries on news reports and requests for verification of market rumours by regulatory authorities. The

Company will endeavor to respond promptly to such requests.

C6. Responding to Market Rumours

The Company shall appropriately and fairly respond to queries on news reports and requests for verification of market rumours by regulatory authorities.

C7. Policy on handling of UPSI and determination of "Legitimate Purposes"

The Company will handle all UPSI on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. Policy for determination of Legitimate Purposes is given at Annexure-I.

D. PROCESS IN CASE OF LEAK OF UPSI

In case of leak of UPSI, following process shall be adopted:-

(i) Appropriate inquiries shall be initiated on becoming aware of leak of UPSI or suspected leak of UPSI.

(ii) Procedure for inquiries shall be in accordance with provisions contained under Conduct, Discipline and Appeal Rules of the Company.

(iii) The Board of Directors of the Company and SEBI shall be promptly informed about such leaks, inquiries and results of such inquiries.

(iv) In case of leak of UPSI by persons other than employees, the instances of leak shall be reported to concerned regulatory authorities/bodies.

E. DIGITAL DATABASE OF RECIPIENTS OF UPSI

The Compliance Officer shall be responsible to maintain a structured database of such persons or entities as the case may be with whom the information is shared, which shall contain the following information:

(i) Name of such recipient of UPSI

(ii) Name of the Organization or entity to the recipient represent
(iii) Postal address and E-mail ID of such recipient
(iv) Permanent Account Number (PAN) or any other identifier authorized by law, if PAN is not available.

The Compliance Officer shall also be responsible to ensure thar such database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

Annexure I

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

(i) Unpublished Price Sensitive Information (UPSI) may be shared only for the legitimate purposes on 'need to know basis'.
The 'legitimate purposes' shall include sharing of UPSI in the ordinary course of business by an insider with another insider, 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 SEBI (Prohibition of Insider Trading) Regulations, 2015 or any amendments thereto.
The indicative list of 'legitimate purposes' for which UPSI can be shared is as under:

1. Sharing of information with auditors, debenture trustees or any other person during preparation of financial results.
2. Sharing of information with Merchant Bankers/Consultants in respect of capital restructuring such as buy-back of shares.
3. Sharing of information with Auditors/bankers/Consultants for declaration of dividend.
4. Sharing of information with Legal Advisors/Consultants for obtaining legal advice.

(ii) UPSI can be shared with the following in furtherance of the conduct/performance of their legal obligations/duties.

- Statutory Auditor(s)
- Secretarial Auditor(s)
- Internal Auditors and Cost Auditors
- Legal Advisors/Consultants

- Dividend Bankers
- Intermediaries like Registrar & Share Transfer Agent, Credit Rating Agency, Merchant Bankers etc.,
- Bankers/Financial Institutions
- Regulatory Authorities / Government Departments
- Any other person not covered above who may require access to UPSI to reasonably discharge his functions

(iii) The UPSI may emanate from any Department within the Company and hence the onus shall be on the concerned Head of Department who is the originator of such UPSI to justify the need to share it with other person on the basis of their functional/legal requirement.

(iv) The concerned HOD also needs to notify the Compliance Officer about sharing the UPSI and also ensure that due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with Regulations. The parties sharing UPSI under legitimate purposes shall execute agreements to maintain confidentiality and provide non-disclosure obligations and such parties shall keep information so received confidential. Parties shall not trade in securities of the Company when in possession of UPSI.

(v) The nature of the UPSI, name of the person who have shared the UPSI and name of the person with whom the UPSI is shared shall be provided promptly to the Compliance Officer along with Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available for monitoring compliance with this Code. Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as "insider" for purposes of this Code.

Sd/-
(Urvashi Tilakdhar)
Senior Managing Director

Dated: 24.12.2025