DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN COMPANY'S SECURITIES BY EMPLOYEES AND OTHER CONNECTED PERSONS UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

(Approved by the Board of Directors on 24.12.2025)

The Securities and Exchange Board of India (SEBI) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015, to put in place a stronger legal and enforcement framework for prevention of Insider Trading. In terms of Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, every listed company is required, *inter alia*, to frame a Code of Conduct to regulate, monitor and report trading by its designated persons and immediate relatives towards achieving compliance with the said regulations for prevention of insider trading. The Code of Conduct is required to contain norms for appropriate Walls procedures, and processes for permitting any designated person to "cross the wall".

In line with the said Regulations, the following "Code of Conduct" has been adopted by the Board of Directors of DCM Shriram Fine Chemicals Limited at its meeting held on 24.12.2025

1. Terms, Definitions, Interpretation and Scope

1.1 "Act" means the Securities and Exchange Board of India Act, 1992 or any modification thereto.

1.2 "Board" means the Board of Directors of DCM Shriram Fine Chemicals Limited.

1.3 "Code" or "Code of Conduct" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of DCM Shriram Fine Chemicals Limited, as amended from time to time.

1.4 "Company" means DCM Shriram Fine Chemicals Limited.

1.5 "Compliance Officer" means Company Secretary, who shall for the purpose of these Regulations report to the Board of Directors and shall provide reports to the Chairman of the Audit Committee at every meeting. In absence of the Company Secretary, the Board of Directors may authorize

any officer of the Company to discharge the duties of Compliance Officer under the regulations.

1.6 "Connected Person" means:

(i) any person who is or has during the six months prior to the concerned act, been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be 'deemed to be connected persons' unless the contrary is established:

(a) a relative of connected persons specified in clause (i) above; or

(b) a holding company or associate company or subsidiary company; or

(c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or

(d) an investment company, trustee company, asset management company or an employee or director thereof; or

(e) an official of a stock exchange or of clearing house or corporation; or

(f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

(g) a member of the Board of Directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

(h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or

(i) a banker of the Company; or

(j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his relative or banker of the Company, has more than ten per cent, of the holding or interest.

1.7 "Dealing in Securities" means an act of subscribing to, redeeming, switching, buying, selling, dealing, or agreeing to subscribe to, redeem, switch, buy, sell or deal in the securities of the Company, either as principal or agent.

1.8 "Designated Person(s)" shall mean persons specified as such by the Board of Directors in consultation with the Compliance Officer and shall include:

(i) every Promoter, members of Promoter Group and Director;
(ii) Chief Executive Officer and employees upto two levels below Chief Executive Officer of the Company, and its material subsidiary(ies) irrespective of their functional role in the Company or ability to have access to unpublished price sensitive information;
(iii) every employee in the grade of Assistant General Managers and above;
(iv) All functional and departmental heads on the basis of access to unpublished price sensitive information;
(v) every employee in the finance, accounts, secretarial and legal departments as may be determined and informed by the Compliance Officer;
(vi) Employees of material subsidiary(ies) of the Company designated from time to time, on the basis of their functional role or access to unpublished price sensitive information in the organization by their Board of Directors; and
(vii) any other employee as may be designated from time to time, considering the objectives of the code;

1.9 "Director" means a member of the Board of Directors of the Company.

1.10 "Employee" means every employee of the Company including the Directors in the employment of the Company.

1.11 "Generally available Information" means information that is accessible to the public on a non-discriminatory basis.

1.12 "Immediate Relative" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

1.13 "Insider" means any person who is,
(i) a connected person; or
(ii) in possession of or having access to unpublished price sensitive information.

1.14 "Key Managerial Personnel" means person as defined in Section 2(51) of the Companies Act, 2013.

1.15 "Material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a

designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions

1.16 "Promoter" / "Promoter Group" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof:

1.17 "Regulations" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

1.18 "Relative" shall mean the following:
(i) spouse of the person;
(ii) parent of the person and parent of its spouse;
(iii) sibling of the person and sibling of its spouse;
(iv) child of the person and child of its spouse;
(v) spouse of the person listed at sub-clause (iii); and
(vi) spouse of the person listed at sub-clause (iv)

1.19 "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof;

1.20 "Takeover regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

1.21 "Trading" means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

1.22 "Trading Day" means a day on which the recognized stock exchanges are open for trading;

1.23 "Unpublished Price Sensitive Information" (UPSI) means any information, relating to the 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 mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
(xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
(xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;
(xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business; and
(xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

2. Dissemination of Price Sensitive Information

The Compliance Officer shall be responsible for:

- Compliance with policies, procedures,

- Maintenance of records,

- Monitoring adherence to the rules for the preservation of unpublished price sensitive information,

- Monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company,

- Making uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure,

- Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available,

- Ensuring that information shared with analyst and research personnel is not unpublished price sensitive information,

- Giving appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities, and

- Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences post them on the official website of the Company to ensure official confirmation and documentation of disclosures made.

2.1. Preservation of "Unpublished **Price Sensitive Information"**

2.1.1 All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The 'policy for determination of legitimate purposes' has been framed by the Company and forms part of 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information'.

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2.1.2 Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that sharing of such information is in the best interests of the Company; or

- not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that sharing of such information is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts.

  However, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, use the information except for the limited purpose it is shared with them and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

2.1.3 Adoption of 'Chinese Wall' policy

To prevent misuse of confidential information the company has adopted a "Chinese Wall" policy which separates those areas of the organization which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing or other departments providing support services, considered "public areas".

The employees in the inside area shall not communicate any unpublished price sensitive information to anyone in public area.

In exceptional circumstances, employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the compliance officer.

The Chinese wall shall be supported by:

i. Separation of each department
ii. Files containing confidential information to be kept secured
iii. Limiting access on ERP system
iv. Keeping confidential information safe and secure under password protections/lock
v. Computer files to be kept with adequate security of login and password, etc.

2.1.4 The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities, as the case may be, with whom UPSI is shared under this regulation along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Such database shall be maintained with adequate internal controls and checks, such as time stamping, audit trails, etc. to ensure non-tampering of the database.

3. Restriction on trading when in possession of Unpublished Price Sensitive Information

Save as provided in this Code and the Regulations, no insider shall trade in securities of the Company.

Provided that the insider may prove his innocence by demonstrating the circumstances including the following:

(i) the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of the provisions of the regulations and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under clause 2.1.2 of this Code.

Provided further that such off-market trades shall be reported by the insiders to the Company within two working days and the Company shall notify the particulars of such trades to the stock exchanges within two

trading days from receipt of the disclosure or from becoming aware of such information.

(ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of the provisions of the regulations and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under clause 2.1.2 of this Code..

(iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

(iv) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

(v) in the case of non-individual insiders: –
(a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

(b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

(vi) the trades were executed pursuant to a trading plan as approved by the Compliance Officer.

4. Trading Plan

4.1 An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

4.2 Such Trading Plan shall:

(i) not entail commencement of trading on behalf of the insider earlier than one hundred and twenty calendar days from the public disclosure of the plan;

(ii) not entail overlap of any period for which another trading plan is already in existence;

(iii) set out following parameters for each trade to be executed:

(a) either the value of trades to be effected or the number of securities to be traded;

(b) nature of the trade

(c) either specific date or time period not exceeding five consecutive trading days;

(iv) price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:

a. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
b. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

(v) not entail trading in securities for market abuse.

4.3 The Compliance Officer shall review the Trading Plan to assess whether the Plan would have any potential for violation of the Regulations and if found in order, approve it. The Compliance Officer shall be entitled to seek further information, details, documents or undertakings as may be necessary, to enable him to make such assessment and to approve the plan and to monitor the implementation of the Plan as per provisions of the Regulations.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.

4.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation.

Further, if the insider has set a price limit for a trade under sub-clause (iv) above, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

4.5 upon approval of the trading plan, the Compliance Officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

5. Trading Window and Window Closure

5.1 (i) The trading period, i.e. the trading period of the stock exchanges, called 'trading window", is available for trading in the Company's securities.

(ii) The trading window shall be closed when the Compliance Officer determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI and shall remain closed for 48 hours after the UPSI becomes generally available. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.

(iii) When the trading window is closed, the designated persons and their immediate relatives shall not trade in the Company's securities.

(iv) For unpublished price sensitive information not emanating from within the Company, trading window may not be closed.

(v) All designated persons shall conduct all their dealings in the securities of the Company only in a valid trading window when it is open and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.

(vi) In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

5.2 The Compliance Officer shall intimate the designated employees, Directors and Promoters the date of closure of trading window when he determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates. The information shall also be intimated to the Stock Exchange and put on the Company's website for information of all concerned.

5.3 The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

6. Pre-clearance of trades

6.1 When the trading window is open, the designated persons (including their immediate relative), who intend to deal in the securities of the Company shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades is above Rs.10,00,000 (Rupees Ten Lakhs only), as per the procedure mentioned hereunder.

An application may be made in the prescribed Form (Annexure 1) to the Compliance officer Indicating the estimated number of securities that the designated person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

(i) An Undertaking (Annexure 2) shall be executed in favour of the Company by such designated person incorporating, inter alia, the following clauses, as may be applicable:

(a) That the designated person (including their immediate relative) does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.

(b) That in case the designated person has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public and two days thereafter.

(c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.

(d) That he/she has made a full and true disclosure in the matter.

(ii) Pre-clearance Order shall be as per format (Annexure 3).

(iii) All designated persons and their immediate relatives shall execute their orders in respect of securities of the Company within seven trading days after the approval of pre-clearance is given. The designated person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed. (Annexure 4).

(v) If the order is not executed within seven trading days after the approval is given, the designated person must get the fresh pre-clearance for the transaction.

(vi) All designated persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All designated persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the

Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

Provided that this shall not be applicable for trades pursuant to exercise of stock options.

In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

(vii) The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

6. Other Restrictions

6.1 The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

6.2 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.

6.3 The disclosures made under this Code shall be maintained for a period of five years.

7. Reporting Requirements for transactions in securities

Initial Disclosure

7.1 Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of the Promoter Group shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter in Form B (Annexure 5A).

Continual Disclosure

7.2 Every Promoter, member of the Promoter Group, designated person, and Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such

transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten Lakhs only) in Form C (Annexure 6).

7.3 The Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of:

(a) the receipt of disclosure, or

(b) from becoming aware of such information, as the case may be.

Explanation: It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in the above clause.

Disclosure by Designated Persons

All Designated Persons shall be required to disclose to the Company, the names and Permanent Account Number or any other Identifier of the following persons on an annual basis and as and when the information changes:

(a) immediate relatives;

(b) Persons with whom the Designated Person shares a material financial relationship;

(c) Phone Mobile/Cell numbers of such persons.

All Designated Person shall within 30 days of the adoption of this Code disclose the names of the educational institutions from which they have graduated and names of their past employers.

8. Disclosure by the Company to the Stock Exchange(s)

8.1 Within two trading days of the receipt of intimation under Clause 7.3 above, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

8.2 The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

Note: The disclosures under these Regulations are in addition to the disclosures required to be made under the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 or any other Regulations.

9. INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING

9.1 The Managing Director shall ensure effective implementation of internal controls to ensure compliance with the requirements of these regulations to prevent insider trading.

9.2 Internal control shall include the following:

a). All employees who have access to unpublished price sensitive information shall be identified as designated person;

b). All the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;

c). adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;

d). lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons for maintaining confidentiality;

e). all other relevant requirements specified under these regulations shall be complied with.

f). periodic process review shall be undertaken to evaluate effectiveness of such internal controls.

g). All insiders to whom unpublished price sensitive information are shared shall be made aware of the duties and responsibilities attached to the receipt of inside information and the liability that attaches to misuse or unwarranted use of such information.

9.3 The Audit Committee of the Company shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

9.4 The Company shall have in place a whistle-blower policy and make its employees aware of any such changes in the policy to enable them to report instances of leak of unpublished price sensitive information.

9.5 If any inquiry is initiated by the Company in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, then the relevant intermediaries and fiduciaries shall co-operate with the Company in connection with such inquiry conducted by the Company.

10. Dissemination of Price Sensitive Information

10.1 No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.

10.2 Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.

- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.

- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.

- Simultaneous release of information after every such meet.

11. Penalty for contravention of the Code of Conduct

11.1 Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).

11.2 Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.

11.3 Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.

11.4 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

12. Authority to make alterations

The Board of Directors will make such alterations to the Code, as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any amendment/s thereto.

Sd/-
(Urvashi Tilakdhar)
Senior Managing Director

Dated: 24.12.2025

DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

ANNEXURE 1
SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

The Compliance Officer, Date:_____
DCM Shriram Fine Chemicals Limited,
6th Floor, Kanchenjunga Building,
18, Barakhamba Road,
New Delhi - 110001

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

1.	Name of the applicant		
2.	Designation		
3.	Number of securities held as on date		
4.	Folio No. / DP ID / Client ID No.)		
5.	The proposal is for		(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of dealing in securities		
7.	Estimated number of securities proposed to be acquired/subscribed/sold		
8.	Price at which the transaction is proposed		
9.	Current market price (as on date of application)		
10.	Whether the proposed transaction will be through stock exchange or off-market deal		
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited		

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

(Signature of Employee)

DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

ANNEXURE 2

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

The Compliance Officer,
DCM Shriram Fine Chemicals Limited,
6th Floor, Kanchenjunga Building,
18, Barakhamba Road,
New Delhi - 110001

I, _____, _____ of the Company residing at _____, am desirous of dealing in _____ * shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking. In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public and two days thereafter. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within Two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date: Signature : _____

* Indicate number of shares

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

ANNEXURE 3

FORMAT FOR PRE- CLEARANCE ORDER

To,

Name : _____

Designation : _____

Place : _____

This is to inform you that your request for dealing in _____ (nos) shares of the Company as mentioned in your application dated _____is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

for DCM Shriram Fine Chemicals Limited

COMPLIANCE OFFICER

Date : _____

Encl: Format for submission of details of transaction.

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

ANNEXURE 4

FORMAT FOR DISCLOSURE OF TRANSACTIONS
(To be submitted within 2 days of transaction / dealing in securities of the Company)

The Compliance Officer,
DCM Shriram Fine Chemicals Limited,
6th Floor, Kanchenjunga Building,
18, Barakhamba Road,
New Delhi - 110001

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on ____ (date)

Name of holder	No. of securities dealt with	Bought/sold/ subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (Applicable in case of purchase / subscription).

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Date: _____

Signature: _____

Name:
Designation:

DCM SHRIRAM INTERNATIONAL FINE CHEMICALS

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

ANNEXURE 5

FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

The Compliance Officer,
DCM Shriram Fine Chemicals Limited,
6th Floor, Kanchenjunga Building,
18, Barakhamba Road,
New Delhi - 110001

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ (date of becoming Specified Person).

I. Details of securities held by me:

Type of Securities	No. of securities held	Folio No	Beneficiary A/c Client ID

II. Details of dependent(s) :

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that i have the following dependents:

Sr. No.	Name of the dependent	Relation with Director / Officer / Designated Employee

III. Details of securities held by dependent(s) :

Name of Relative	Relationship	Type of securities	No. of Securities held	Folio No B	Beneficiary A/c Client ID

Date: _____ Signature: _____

DCM SHRIRAM FINE CHEMICALS LIMITED: NEW DELHI

ANNEXURE 6
DISCLOSURE OF CHANGE IN SHAREHOLDING

The Compliance Officer,
DCM Shriram Fine Chemicals Limited,
6th Floor, Kanchenjunga Building,
18, Barakhamba Road,
New Delhi - 110001

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:

Name, PAN No. & address of shareholder	No. of securities held before the transaction	Receipt of allotment advice/ acquisition of /sale of securities	Nature of Transaction & quantity			Trading member through whom the trade was executed with SEBI Registration No. of the TM
			Purchase	Sale	Others	

Details of change in securities held by dependent family members:

Name, PAN No. & address of shareholder and relationship	No. of securities held before the transaction	Receipt of allotment advice/ acquisition of /sale of securities	Nature of Transaction & quantity			Trading member through whom the trade was executed with SEBI Registration No. of the TM
			Purchase	Sale	Others	

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Date: _____ Signature: _____