



Atul Ltd

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March 26, 2019

The Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

SCRIP CODE: 500027
BSE Listing portal

The Manager
Listing Department
National Stock Exchange of India Limited
“Exchange Plaza” C – 1, Block G,
Bandra Kurla Complex,
Bandra (East)
Mumbai – 400 051

SYMBOL: ATUL
NEAPS portal

Dear Sirs:

Sub: Amended Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information

Ref: Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015), we are enclosing herewith amended “Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information” as approved and adopted by the Board of Directors of the Company.

Kindly acknowledge the receipt and inform the members of the Exchanges.

Thank you,

Yours faithfully,
FOR ATUL LTD

Lalit Patni
Company Secretary and
Chief Compliance Officer



ATUL LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015) ("the Regulations")

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:

- a) The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b) The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- c) The Company Secretary shall act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished Price Sensitive Information.
- d) The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e) The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f) The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
- g) The Company will develop best practices to make available transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- h) 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 the insider's legitimate purposes, performance of duties or discharge of legal obligations.
- 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,

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auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.

- j) Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of the Regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with the regulations.
- k) Any person in receipt of unpublished price sensitive information pursuant to a “Legitimate Purpose” shall be given due notice to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations.

The Code has been adopted by the Board of Directors in its meeting held on March 15, 2019 and shall be effective from April 1, 2019.

