

NATIONAL STEEL AND AGRO INDUSTRIES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This Code is called National Steel and Agro Industries Limited Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") and is framed based on the principles of fair disclosure outlined in Schedule A to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

"Unpublished Price Sensitive Information" ("UPSI"):

"Unpublished Price Sensitive Information" ("UPSI") means any information, relating to a company or its securities, directly or indirectly, that is not generally available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 and such other transactions;
- (v) changes in key managerial personnel; and

Chief Investor Relation Officer:

The Board of Directors has decided that the Executive Director/ Managing Director/ CEO of the company shall be Chief Investor Relation Officer, who shall deal with dissemination of information and disclosure of UPSI and report to the Board of Directors, for purpose of this Code.

The Chief Investor Relation Officer shall ensure the following:

1. Prompt public disclosure of UPSI 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 UPSI to avoid selective disclosure;
3. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities;
5. The information shared with analysts and research personnel is not UPSI;
6. 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;
7. Handling of all unpublished price sensitive information on a need-to-know basis.

Note: Words not defined herein shall have the meaning as per the SEBI (Prohibition of Insider Trading) Regulations, 2015
