



**ASSAM CARBON PRODUCTS LTD**

Corporate Identification Number (CIN) — L23101AS1963PLC001206

Registered Office : Birkuchi, Guwahati, Assam - 781026.

Website: [www.assamcarbon.in](http://www.assamcarbon.in) Tel: (0361)2640741/630; Fax: (0361)2640368

Email: [acplghy@ascarbon.com](mailto:acplghy@ascarbon.com)

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (PURSUANT TO REGULATION 8(1) OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015)**

Assam Carbon Products Limited ('ACPL') shall adhere to the practices and procedures detailed in this Fair Disclosure Policy document, in order to ensure fair disclosure of events and occurrence that could potentially impact price of listed securities of the Company in the market.

Assam Carbon Products Limited shall follow the Principles of Fair Disclosures as detailed hereunder:

1. ACPL shall promptly disclose any information that could have material impact on price of Equity shares or securities of the Company (herein after called Unpublished Price Sensitive Information 'UPSI');
2. ACPL shall ensure uniform & universal disclosure of UPSI through the Stock exchange(s) and make public dissemination of the said information on a nondiscriminatory basis;
3. ACPL will make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise, in any forum in India or abroad, to make such information generally available;
4. ACPL shall ensure that any information shared, with analysts and/or research personnel or at any investor relation conferences, is not an UPSI;
5. ACPL will make transcripts or records of proceedings, if any, of meetings with analysts or at other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made;
6. ACPL shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities;
7. Any information that may be potentially construed or classified as UPSI would be dealt with by the Directors and Employees of the Company only on 'Need to Know' basis;
8. The Chief Financial Officer of the Company shall serve as the 'Chief Investor Relations Officer' for the purposes of this Policy to deal with dissemination of information and disclosure of UPSI.

This Fair Disclosure Policy document, as may be amended from time to time, has been duly approved by the Board of Directors of the Company and adopted in line with the principles set out in Schedule A of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and shall be applicable and binding on all Directors/Employees of the Company.

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