

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Securities and Exchange Board of India (SEBI) has formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the 'Regulations') with a view to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework thereof. Regulation 8 requires the Board of Directors of every listed company to formulate and publish on its official website, a code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information.

The Board of Directors of Nahar Industrial Enterprises Limited (NIEL) has adopted this Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (Code) to ensure timely, fair and adequate disclosure of unpublished price sensitive information to protect the interest of investors in general. The Code shall be followed by the Company's Directors, Key Managerial Personnel, Employees and Connected persons. The Code is consistent with the principles as set out in Schedule A to the Regulations.

The principles adopted by NIEL for fair disclosure are as follows:

1. The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall ensure uniform and universal dissemination of unpublished price sensitive information as and when required to be made to avoid selective disclosure.
3. The Company Secretary/ Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel, if any, would not be unpublished price sensitive information.
7. The Company shall develop and follow 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.
8. The Company shall handle of all unpublished price sensitive information 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 his legal obligations.

This code is subject to review from time to time by the Board of Directors of Company. Any subsequent modification(s)/ amendment(s) to the Regulations shall automatically apply to this code.

Certified to be True Copy

for Nahar Industrial Enterprises Limited


Company Secretary