

**POLICY AND PROCEDURES FOR INQUIRY IN
CASE OF LEAK OF UNPUBLISHED PRICE
SENSITIVE INFORMATION**



AksharChem (India) Limited
CIN : L24110GJ1989PLC012441

POLICY AND PROCEDURES FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This document forms the Policy And Procedures For Inquiry in case of Leak of Unpublished Price Sensitive Information adopted by AksharChem (India) Limited (the Company) This Policy intends to formulate a framework and procedures for inquiry in case of leak of unpublished price sensitive information and intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company events and occurrences that could impact price discovery in the market for the Company's listed securities. This Policy is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("the PIT Regulations").

Pursuant to Reg.9A (5) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Policy has been reviewed and has been duly approved by the Board of Directors of the Company. The revised Policy is becoming effective from June 01, 2019.

SCOPE OF THE POLICY

- The policy intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company;
- Insiders should not act on their own in conducting any investigation activities;
- Any untrue allegations will not be taken up and investigated and appropriate action will be taken for the same;
- Appropriate and fair enquires and verification on market rumours;

INVESTIGATION AND PROCEDURE OF INQUIRY

- Board of Directors authorise immediate superior of the department and Company secretary & compliance Officer of the Company to initiate appropriate inquiries on becoming aware of leak of UPSI or suspected leak of UPSI and inform the Board promptly of such leaks, inquiries and results of such inquiries.

How to Report;

- You must report all suspected violations to
 - Your Immediate Superior;
 - Company Secretary and Compliance Officer ; at cs@aksharchemindia.com
- If you have reason to believe that your immediate supervisor or the Compliance Officer is involved in the suspected violation, your report may be made to the

Audit Committee of the Company at:

Chairman Audit Committee: Dr. Pradeep Jha
AksharChem (India) Limited

- The investigation shall be completed normally within 45 days of the receipt of the complaint.
- If it is not completed within 45 days, Compliance office shall provide proper explanations to the Chairman of the Audit Committee for the delay.
- Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment.
- All reports under this Policy will be promptly and appropriately investigated and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law.
- Everyone working for or with the Company, should cooperate in the investigation of reports of violations
- Failure to cooperate in an investigation or deliberately providing false information during an investigation can be the basis for disciplinary action, including termination of employment.
- If, at the conclusion of investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy.
- All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law.

MODIFICATION

The Board of Directors of the Company can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with central, state or local regulations and/or accommodate organizational changes within the Company.

The words and expressions used in the Policy but not defined herein shall have the same meaning ascribed to them in the Regulations.

AMENDMENTS

This Policy shall be reviewed from time to time and any amendments or modifications in this Policy shall be subject to the review and approval by the Board of Directors of the Company. In case any amendments, clarifications, circulars and guidelines issued by Securities and

Exchange Board of India/Stock Exchanges, not being consistent with the provisions laid down under this Policy, then the provisions of such amendments, clarifications, circulars and the guidelines shall prevail upon the provisions contained in this Policy and the same shall stand amended accordingly effective from the date as laid down under such amendments, clarifications, circulars and guidelines.