



SAHARA

INDIA PARIWAR

MASTER CHEMICALS LIMITED

CIN: L99999MH1980PLC022653

**REGISTERED OFFICE: Sahara India Point, CTS 40-44, S.V. Road, Goregaon (W),
Mumbai-400 104. Tel: 022 42871800 Fax: 022 42871870**

E-mail: statutorymcl@rediffmail.com site: www.masterchemicals.in

April 08, 2019

**To,
BSE Ltd.
Phiroze Jeejeebhoy Towers,
Dalal Street, Bandra
Mumbai -400 001**

Scrip Code: 506867

Kind Attn: LISTING DEPARTMENT

Sub: Intimation under Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir/Madam,

We wish to inform you that pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018, please find the revised copy of Policy for Fair Disclosure of Unpublished Price Sensitive Information (UPSII), which shall be effective from April 08, 2019. The same is also being uploaded on the website of the Company.

We request you to take the above information on record.

Yours truly

For Master Chemicals Limited

Raanana

**Rana Zia
(Director)
DIN: 07083262
Address: Flat No. 501/507,
Shakt Sai, Chapel Road,
Near Udai Clinic,
Nampally, Hyderabad - 500001**

Policy for Fair Disclosure of Unpublished Price Sensitive information

Scope and purpose

The purpose of this Policy for Fair Disclosure of Unpublished Price Sensitive Information (the 'Policy') is to formulate the rules, fair disclosure and procedures to be followed for disclosure of events and the information in the nature of Unpublished Price Sensitive Information (UPSI) which could have impact on the price of the listed securities of Master Chemicals Limited (the Company) on the Stock Exchanges.

Definition

i. 'UPSI' stand for "Unpublished Price Sensitive Information" means any information, matters relating to the company or its securities, that is not generally available to outsider which upon becoming generally available is likely to materially affect the market price of the securities of the Company and UPSI shall ordinarily include information relating to the Financial Results; Dividends; Changes in capital structure; mergers / demergers / acquisition/ delisting/ disposal / business expansion and such other corporate action transactions; changes in key managerial personnel, etc.

DISCLOSURE OF PRICE SENSITIVE INFORMATION

1. Disclosure/ dissemination of any Unpublished Price Sensitive Information (UPSI) shall be done promptly by the Chief Financial Officer in consultation with Board of Directors ("hereinafter individually referred to as Authorized Person"), by intimating to the Stock Exchanges and posting of the said information on the website of the Company and/or otherwise making it generally available.

2. The Authorized Person shall ensure uniform dissemination/ disclosure of UPSI, so as to avoid selective disclosure (except legitimate purpose).

3. No UPSI shall be shared with any person except for legitimate purpose unless the information is made generally available i.e. only public information can be shared.

4. In absence of the Authorized Person, such person as may be authorized by the Board of Directors shall discharge the duties of the Authorized Person.

Prevention of Leakage of UPSI

To prevent leakage of UPSI Board of Directors shall:

(i) Not discuss UPSI in public places where such UPSI may be overheard, or participate in, host or link to any internet chat rooms, online social networking sites, newsgroups, discussions or bulletin boards which discuss matters pertaining to Company's activities or its securities;

(ii) Not carry, read or discard UPSI in an exposed manner in public places;

(iii) Not discuss or share UPSI with any other persons, except as required in furtherance of legitimate purposes or performance of duties or legal obligation;

(iv) Advise, at the commencement of any meeting where UPSI is likely to be discussed or shared, not divulge the UPSI to the other attendees of such meeting;

vi) Ensure that subsequent queries/clarifications be responded only by way of official email, meetings, over the phone (including SMS) but shall be addressed only to concerned persons.

Sharing of UPSI for Legitimate Purpose(s)

Any UPSI can be shared by the Employees and Directors of the Company only as per need of the Company and for furtherance of legitimate purpose, or performance of duties or legal obligations and any such sharing of UPSI shall be construed in accordance with the following purpose:

- Business Strategy and Corporate Action
- Operational efficiency
- Regulatory Obligation
- Need based specific purposes
- Contractual Obligation

ISSUE OF NOTICE TO THE RECIPIENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

a. The recipient of UPSI which is communicated for any "legitimate purpose" shall be considered as an "insider" under the "Code of Conduct" adopted by the Company and such notice shall be given to the recipient of UPSI by the person making communication of UPSI in order;

- To make aware recipient that the information shared is or would be UPSI.

- To make aware to recipient the duties and responsibility attached to the receipt of such UPSI and the liability attached to misuse or unwarranted.
- To instruct recipient to maintain confidentiality of such UPSI in compliance with the Code of Conduct for Prevention of Insider Trading and the other applicable laws.
- To advise recipient to be in compliance with applicable provisions of PIT Regulations.

RESPONSIBILITY OF THE RECEIPT OF UPSI

- To maintain and keep secret and confidential the information received.
- To use the confidential information only for the legitimate purpose.
- To disclose the confidential information to any other person strictly on a need to know basis.
- To safeguard the UPSI with the same degree of care so avoid unauthorized disclosure as the receiving party uses to protect its own confidential information, but in no case less than reasonable care.
- To ensure compliance with applicable provisions of PIT Regulations.

Amendment to the Policy

The Board of Directors shall make such alterations as considered appropriate to the Policy subject to the condition that any such alterations shall not be inconsistent with the provisions of SEBI PIT Regulations.

Every amendment to this Policy (other than the deemed amendments in view of changes in SEBI PIT Regulations) shall be promptly intimated to stock exchanges where the securities are listed. This Fair Disclosure Policy shall be hosted on the website of the Company.