



PIONEER AGRO EXTRACTS LTD.

CIN NO L15319PB1993PLC012975

ANNEXURE-A

Code of practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to SEBI (Prohibition of Insider Trading) Regulation, 2015)

(EFFECTIVE FROM 15.05.2015)

The Principles based on which the code for corporate Disclosure formulated are as follows:-

1. The Company shall promptly disclose to the public all unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company shall make uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Company shall appoint a company secretary and chief financial officer of Pioneer Agro as a chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
4. The Company shall make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall make 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 is not UPSI.
7. The Company shall developing 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 UPSI on a need to know basis.
9. The code and any subsequent amendments(s) thereto, shall be promptly intimated to the stock exchange where the securities of the company are listed.

10) This code and any amendment thereof will be published on the Company Website.

PIONEER AGRO EXTRACTS LTD.

Soni
COMPANY SECRETARY

The Pioneering Continues...