

March 28, 2019

BSE Ltd.,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Fort, Mumbai 400 001.
Scrip Code: 532504

National Stock Exchange of India Ltd.,
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai 400 051
Scrip Code: NAVINFLUOR EQ

Dear Sir/Madam,

Subject: Code of Fair Disclosure and Conduct under SEBI (PIT) Regulations, 2015

The Board of Directors of the Company has approved an amendment to the Code of Fair Disclosure and Conduct under Regulation 8 read with Regulation 3(2A) of SEBI (Prevention of Insider Trading) Regulations, 2015. This amendment will become effective from April 1, 2019. The amended Code is enclosed.

Request you to take the same on record.

Thanking You,
Yours faithfully,
For **NAVIN FLUORINE INTERNATIONAL LIMITED**



Akshika Thakkar
Authorised Signatory

CODE OF FAIR DISCLOSURE AND CONDUCT UNDER REGULATION 8 READ WITH REGULATION 3(2A) OF SEBI (PREVENTION OF INSIDER TRADING) REGULATIONS, 2015

The Company shall follow the following Code of practices and procedures for fair disclosure of unpublished price sensitive information ('UPSI') in order to adhere to each of the principles set out in Schedule A to SEBI (Prevention of Insider Trading) Regulations, 2015 without diluting the provisions of those Regulations.

1. The Company shall promptly make public disclosure of 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 ensure that uniform and universal dissemination of UPSI is made to avoid selective disclosure.
3. For the purpose of this Code, the Managing Director and in his absence, the Chief Financial Officer of the Company is designated as the Chief Investor Relations Officer to deal with the dissemination of information and disclosure of UPSI.
4. The Company shall ensure prompt dissemination of UPSI 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 request 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 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. All the employees /directors of the Company who are handling in any way, the UPSI shall handle such information on a need-to-know basis and shall ensure that such price sensitive information once finally approved by the Board is disclosed promptly to the stock exchanges at which shares of the Company are listed. Further all price sensitive information of the Company shall be required to be handled within the organisation on a need-to-know basis and no UPSI shall be communicated to any person except in

furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or securities listed, except in furtherance of legitimate purpose(s), which shall include the following;

(i) Sharing of UPSI in the ordinary course of business by any Insider, Designated Person, or by any Authorized person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants;

(ii) Sharing of UPSI where such communication is in furtherance of performance of duty (ies);

(iii) Sharing of UPSI for discharge of legal obligation(s);

(iv) Sharing of UPSI for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

Provided that such sharing should not be carried out to evade or circumvent the prohibitions of the SEBI (Prevention of Insider Trading) Regulations, 2015.