

HATSUN AGRO PRODUCT LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

**[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015] Adopted by the Board
of Directors on 19th January, 2026]**

OBJECTIVE:

Hatsun Agro Product Limited (Company) vide Board Resolution dated 28th May 2015 adopted this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information("Code") that the Board of Directors of the Company will adhere to while handling and disclosure of Unpublished Price sensitive Information. This Code was further amended by the Board Resolution dated 29th March, 2019. This code has now been revised effective from 19th January, 2026 to be in line with the updated SEBI (Prohibition of Insider Trading) Regulations, 2015.

ADHERENCE TO THE CODE:

The Board of Directors of the Company (the Board) undertakes to adhere to the Code and shall always make a fair disclosure of corporate events, occurrences, transactions which could give rise to UPSI which in turn can impact price discovery in the market for the securities of the Company.

APPLICABILITY:

This Code is applicable upon the Members of the Board of Directors of the Company with effect from 19th January, 2026 and shall supersede the previous code dated 29th March, 2019. Any modifications and/or amendments brought about by SEBI subsequently shall automatically apply to this Code.

CODE OF FAIR DISCLOSURE:

The Code of Fair Disclosure adopted by HATSUN are as follows:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information including events and Occurrences that would impact price discovery in the market for its securities no sooner than credible and concrete information comes into being in order to make
2. The Company shall ensure to make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed to avoid selective disclosure of unpublished price sensitive information.
3. The Company Secretary / Compliance Officer shall act as the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
7. The Company shall publish proceedings of meetings held if any with analysts and of other investor relations conferences on its official website www.hap.in to ensure official confirmation and documentation of disclosures made therein.

8. The Company shall handle all unpublished price sensitive information on a need-to-know basis only.

AMENDMENTS:

The Managing Director of the Company, subject to approval of the Board, is authorised to amend or modify this Code in whole or in part. The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information. This Code shall be published on the official website of the Company. This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.

Amended on 19th January 2026