



11th November, 2020

To,

The Manager,
Compliance Department
BSE Ltd
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

SCRIP CODE: 539660

SCRIP ID: BESTAGRO

Sub: Outcome of the Board Meeting pursuant to Regulation 30 and Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended

Dear Sir/Madam,

Pursuant to Regulation 30 & 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, please note that the Board of Directors of the Company in its meeting held today i.e. **Wednesday, 11th November, 2020** has considered and approved the following:

1. Un-Audited Financial Results for the Quarter and Half-Year ended 30th September, 2020 and Limited Review Report issued by M/s Walker Chandiook & Co LLP, Chartered Accountants, Statutory Auditor of the Company.
2. Appointment of Mrs. Astha Wahi as Head Company Secretary and Compliance Officer of the Company w.e.f. 11th November, 2020. Necessary information in respect of Mrs. Astha Wahi as per SEBI Circular No. CIR/CFD/CMD/4/2015 dated September 9, 2015 read with Regulation 30 -Para A of Part A of schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time **(Annexure A)**.

Consequent to her appointment, Mrs. Astha Wahi has also assumed the office of Key Managerial Personnel (as Head Company Secretary) of the Company along with Ms. Himanshi Negi.

3. The revised policy on Code of practices and procedure for fair disclosure of unpublished price sensitive information in order to adhere to the guidelines made in SEBI (Prohibition of Insider Trading Regulations) Amendment, 2018. The same is also available on the Company's website at www.bestagrolife.com **(Annexure-B)**
4. In terms of the Regulation 30(5) of (Listing Obligations and Disclosure Requirements) Regulations, 2015, the following Key Managerial Personnel have been authorised by the Board of Directors in its meeting held today for the purpose of determining materiality of an event or information for the purpose of disclosures to the stock exchange:





Best Agrolife Limited

(Formerly Sahyog Multibase Limited)

CIN : L74110DL1992PLC116773

S.No.	Name of the KMP	Designation	Contact Details
1	Mr. Vimal Kumar	Managing Director	Address: S-1A, Ground Floor, Bhagwan Dass Nagar, East Punjabi Bagh, New Delhi-110026 Email ID: info@bestagrolife.com Phone No.: 011-45803300
2	Mr. Deepak Bhutani	Chief Financial Officer	Address: S-1A, Ground Floor, Bhagwan Dass Nagar, East Punjabi Bagh, New Delhi-110026 Email ID: info@bestagrolife.com Phone No.: 011-45803300
3	Mrs. Astha Wahi	Head Company Secretary and Compliance Officer	Address: S-1A, Ground Floor, Bhagwan Dass Nagar, East Punjabi Bagh, New Delhi-110026 Email ID: info@bestagrolife.com Phone No.: 011-45803300
4	Ms. Himanshi Negi	Company Secretary and Compliance Officer	Address: S-1A, Ground Floor, Bhagwan Dass Nagar, East Punjabi Bagh, New Delhi-110026 Email ID: info@bestagrolife.com / cs@bestagrolife.com Phone No.: 9811876512

The meeting of the Board of Directors commenced at 3.00 P.M and concluded at 4.40 P.M.

Please take this information on record.

Thanking You,

Yours Faithfully,

For Best Agrolife Limited

For **BEST AGROLIFE LIMITED**
Himanshi Negi
Company Secretary

Himanshi Negi
Company Secretary and Compliance Officer

Encl. as above



Annexure-B



BEST AGROLIFE LIMITED

**Code of Conduct of Practices and Procedures for Fair
Disclosure of Unpublished Price Sensitive Information
("Code")**

**[Pursuant to Regulation 8 read with Regulation 3(2A) of SEBI (Prohibition of Insider Trading)
Regulations, 2015]**

PREFACE

As part of Company's commitment to transparency and good governance, this Code of practices and procedures for fair disclosure of unpublished price sensitive information has been framed with an objective to preserve the confidentiality of unpublished price sensitive information and to ensure fairness in dealing with all stakeholders. This Code is made pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015. Capitalised terms used but not defined in this Code, shall have the meaning as ascribed to such terms under the Company's Code of Conduct to regulate, monitor and report trading by Designated Persons in Securities of Best Agrolife Limited, as amended from time to time ("Insider Trading Policy").

OBJECTIVE

The objective of this Code is to formulate a framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities.

PRACTICES AND PROCEDURES

The following principles of fair disclosure for the purposes of "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" shall be strictly followed by the Company with immediate effect:-

- a) The Company shall promptly disclose to the public "unpublished price sensitive information" (UPSI) that would impact price discovery, no sooner than such credible & concrete information comes into being in order to make such information generally available.
- b) The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- c) The Company shall uniformly & universally disseminate information (UPSI) and avoid selective disclosure.
- d) The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information generally available to all/public.
- e) The Company shall render appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities, if any.
- f) The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website, in order to ensure official confirmation and documentation of disclosures made.
- g) Company has designated the Compliance Officer to oversee corporate disclosure.
- h) Compliance Officer will ensure that the Company complies with continuous disclosure requirements. He/She will co-ordinate disclosure of price sensitive information to Stock Exchanges, Analysts, Shareholders and media which will be approved by him/her in advance.
- i) The Compliance Officer and / or the Chief Executive Officer shall be responsible for deciding whether a public announcement is necessary for verifying or denying any news for effectively responding to market gossips.

- j) The Company will make timely and adequate disclosure of shareholding/ changes in ownership/ownership by major shareholders required under the Regulations / SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, to the Stock Exchanges.
- k) The Company shall notify the stock exchanges within two trading days from receipt of the disclosure or from becoming aware of an off-market trade between Insiders who are in possession of UPSI, such off-market trades shall be reported by the Insiders to the Company within two working days.
- l) The Company shall handle all UPSI on a need-to-know basis.

LEGITIMATE PURPOSE

The UPSI can be shared as an exception for Legitimate Purposes (as per its "Policy for determination of Legitimate Purposes" (**Annexure A**), provided it is not shared to evade or circumvent the prohibition under the Regulation), performance of duties, or discharge of legal obligations.

CODE OF CONDUCT

The Company shall adhere to the prescribed standards, under the Insider Trading Policy.

DIGITAL DATABASE

The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities, as the case may be, with whom UPSI is shared under Regulation 3 along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Such database shall be maintained with adequate internal controls and checks, such as time stamping, audit trails, etc. to ensure non-tampering of the database.

RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

The Board of Directors of the Company shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, and shall not otherwise trade in securities of the company when in possession of UPSI.

CHIEF INVESTOR RELATIONS OFFICER

The Compliance Officer of the Company has been designated / called as "Chief Investor Relations Officer" to deal with dissemination of information and disclosure of UPSI.

AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment(s) or re-enactment thereto.

APPROVED AND ADOPTED

This Code has been approved and adopted by the Board on November 11, 2020.

For BEST AGROLIFE LIMITED
[Handwritten Signature]
N. S. J.
Company Secretary

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

[Pursuant to Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

PREFACE

This Policy, as a part of "Code of Fair Disclosure and Conduct" formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy". This Policy is prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

OBJECTIVE

The objective of this Policy is to identify 'Legitimate Purposes' which will be considered as exception for the purpose of sharing / procuring unpublished price sensitive information (UPSI) relating to the Company or its listed securities or proposed to be listed securities, if any.

LEGITIMATE PURPOSES

"Legitimate Purposes" shall mean sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

1. Promoters of the Company
2. Auditors (Statutory, Internal, Branch, Cost, Secretarial, GST and any other Auditor as applicable)
3. Staff Members of the Audit firm/team conducting the Audit
4. Collaborators
5. Lenders
6. Customers
7. Suppliers
8. Bankers
9. Legal Advisors
10. Insolvency Professionals
11. Consultants
12. Any other advisors/consultants/partners

It is hereby clarified that any person in receipt of UPSI pursuant to a "legitimate purpose" shall also be considered as an "insider" for the purpose of this Code, the Insider Trading Policy and the Regulations and thus such persons shall maintain confidentiality of such UPSI in compliance with this Code, the Insider Trading Policy and the Regulations.

AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy. In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy. This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment(s) or re-enactment thereto.

For BEST AGROLIFE LIMITED
[Handwritten Signature]
N. S. J.
Company Secretary