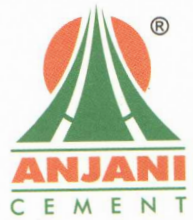


ISO 9001 : 2015, ISO 14001 : 2015 and
BS OHSAS 18001 : 2007 Company
Award of Excellence in CSR by FAPCCI
CIN : L26942MH1983PLC265166

Anjani Portland Cement Ltd

(A Subsidiary of Chettinad Cement Corporation Pvt. Ltd.)



The BSE Limited
Phiroje Jeejeebhoy Towers,
Dalal Street, Mumbai- 400 001

March 29, 2019

National Stock Exchange of India Ltd (NSE),
Exchange Plaza, Bandra-Kurla Complex,
Bandra (East), Mumbai – 400051

Dear Sir,

Sub: Intimation under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In terms of Regulation 30 of the Securities & Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, please find enclosed the "Revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" as approved by the Board of Directors of the Company.

Request you to kindly take the above information on record

Thanking you,

Yours faithfully,
For Anjani Portland Cement Ltd.,

Anu Nair
Company Secretary



Corporate Office : # 6-3-553, Unit No.: E3 & E4,
4th Floor, Quena Square, Off Taj Deccan Road,
Erramanzil, Hyderabad - 500 082. Telangana.
T : +91 40 2335 3096 / 3106, F : +91 40 2335 3093
E : info@anjaniment.com

Works : Chintalapalem Village & Mandal,
Suryapet Dist. - 508 246. Telangana.
T : +91 08683 230 158,
+91 08683 230 166, 230 168
F : +91 08683 230 024

Regd. Office : 306A, The Capital, 3rd Floor, Plot No. C-70, G-Block, Bandra Kurla Complex,
Bandra (East), Mumbai - 400051, Maharashtra, India. T: +91 22 40239909
Email: secretarial@anjaniment.com, www.anjaniment.com

Code of Practices and Procedures for Fair Disclosure of UPSI

[in accordance with SEBI (Insider Trading) Regulations, 2015]



Anjani Portland Cement Limited

(Effective from May 15, 2015)

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. INTRODUCTION

- 1.1 The Company shall abide by this code of practices and procedures for fair disclosure of all unpublished price sensitive information ("**Code**"), as required from time to time, in accordance with the SEBI (Insider Trading) Regulations, 2015 ("**Insider Trading Regulations**").
- 1.2 Words and expressions, used but not defined herein shall carry the same meaning as assigned to them under the Insider Trading Regulations.

2. DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- 2.1 The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- 2.2 The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 2.3 The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 2.4 The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 2.5 The Company shall ensure that information shared with analysts and a research personnel is not unpublished price sensitive information.
- 2.6 The Company shall develop and follow 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.
- 2.7 All unpublished price sensitive information would be dealt with by the directors and employees of the Company on need-to-know basis only.

***2.8 SHARING OF INFORMATION FOR LEGITIMATE PURPOSE**

Unpublished price sensitive information can be shared by insiders with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. The following shall be considered as legitimate purpose generally:

- where it is necessary for the performance of the contract;
- where it is necessary for compliance with a legal obligation to which we are subject; and/or
- where it is necessary for the purposes of the legitimate interests pursued by us or a third party.

3. CHIEF INVESTOR RELATIONS OFFICER

3.1 The Compliance Officer of the Company shall act as Chief Investor Relations Officer (“**CIRO**”) under the Insider Trading Regulations, 2015. The CIRO is authorized by the Company to ensure proper and timely dissemination of information and disclosure of unpublished price sensitive information.

3.2 All queries or requests for verification of market rumours from stock exchanges or other regulatory authorities may be directed to the CIRO at the following address:

The Chief Investor Relations Officer
Anjani Portland Cement Limited
A-610, Kanakia Wall Street,
Chakala Junction, Andheri-Kurla Road,
Andheri (East), Mumbai – 400093,
Maharashtra, India.
Tel: 022-62396051/ 70

Email Id: secretarial@anjanicement.com

The CIRO shall respond to all such requests from stock exchanges etc without delay.

*Amendment approved by Board of Directors via circular resolution on March 29,2019