

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**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE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- 1.1 The Company shall abide by this code of practices and procedures for fair disclosure of all unpublished price sensitive information ("**Code**"), as required from time to time, in accordance with the SEBI (Insider Trading) Regulations, 2015 ("**Insider Trading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 DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- 2.1 The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- 2.2 The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 2.3 The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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- 2.5 The Company shall ensure that information shared with analysts and a research personnel is not unpublished price sensitive information.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- 2.7 All unpublished price sensitive information would be dealt with by the directors and employees of the Company on need-to-know basis only.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Unpublished price sensitive information can be shared by insiders with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors,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