Policy for dealing with Leak or Suspected Leak of Unpublished Price Sensitive Information
[Pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Policy (Policy) for dealing with Leak or Suspected Leak of Unpublished Price Sensitive Information shall come into effect from 1st April2019.

The Policy is being framed in compliance with the requirement stipulated under Regulation 9A (5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the Regulations), for dealing with leak or suspected leak of unpublished price sensitive information.

An 'insider', as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015, shall not communicate or share any unpublished price sensitive information (UPSI) relating to the Company or securities listed or proposed to be listed, to any person and shall handle all information on need-to-know basis. No UPSI shall be communicated to any person except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

In the case of any leak or suspected of leak of UPSI, the Company shall adopt the following procedures:

1. Ascertain whether the information isprice sensitive and unpublished.
2. Determine whether the person who is suspected of having leaked the information is an 'insider' according to the Code adopted by the Companyand whether such person was authorised topossess such information.
3. Ascertain the impact of the leak on the market and various stakeholders.
4. Initiate an enquiry to ascertain the reasons for such leak or suspected leak and establish the certainty of the same.
5. Seek appropriate statements and declarations from the insider(s) who are found guilty of such leak of UPSI.
6. Initiate appropriate disciplinary action on such insider(s) in accordance with the Code, including legal action, if considered necessary.
7. Inform the Securities and Exchange Board of India directly or through National Stock Exchange of India Limited about such leaks, enquiries and the outcome of such enquiries within two working days from the date of completion of all proceedings in this connection.

Duties of a Compliance Officer
The Compliance Officer shall be responsible for:

(i) overseeing the Compliance of this Policy;
(ii) informing the Board of Directors about any incident of the actual or suspected leak of UPSI; and

(iii) reporting the incident of the actual or suspected leak of UPSI to SEBI and Stock Exchanges and outcome of the preliminary and detailed inquiry.

Amendment

The Committee, subject to applicable laws, rules and regulations, may amend / the Policy from time to time.