

HeidelbergCement India Limited
Code of Practices and Procedures for Fair Disclosure of
Unpublished Price Sensitive Information

This Code will be known as “**HeidelbergCement India Limited - Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**” (Code) [As envisaged under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The following norms shall be followed by the Company to ensure timely and adequate disclosure of Unpublished Price Sensitive Information: -

- (a) Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- (b) Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- (c) In order to ensure that the information is generally available, the same will be transmitted to the Stock Exchanges where the shares of the Company are listed for posting it on their respective websites. The information shall also be made available on the Company’s website, www.mycemco.com.
- (d) Managing Director shall designate a Senior Officer of the Company as Chief Investor Relations Officer to deal with investors’ conferences, analysts and institutional investors. The Company Secretary shall be the authorized official for disclosure of price sensitive information to stock exchanges.
- (e) Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (f) Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (g) Ensuring that information shared with Analysts and Research personnel is not Unpublished Price Sensitive Information.
- (h) Following guidelines will be adopted by the Company while attending/dealing with earnings calls/investors’ conferences, analysts or institutional investors:
 - The Company will provide only Generally Available Information to analysts, research persons and investors.
 - Presentation given to investors/analysts at the earnings calls/investors’ conferences organized by the recognized market intermediaries shall be simultaneously posted on the Company’s website for information of the investors and transcripts or recordings of the proceedings of meetings with analysts and other investor relations conferences shall be made available on the Company’s website, www.mycemco.com.
- (i) Handling of all unpublished price sensitive information on a need-to-know basis.
- (j) External entities namely lenders, merchant bankers, legal advisors, auditors and consultants must ensure that they use Unpublished Price Sensitive Information (UPSI) provided by the Company only for “Legitimate Purpose” and maintain strict confidentiality of such information¹.

“Legitimate Purpose” shall mean usage of Unpublished Price Sensitive Information by external entities only for discharging the duties assigned to them.

¹ W.e.f. 01.04.2019.