

Isgec Heavy Engineering Limited

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(As per Regulation 8(1) of the Securities and Exchange Board of India (**Prohibition of Insider Trading**) Regulations, 2015 (“**Regulations**”) read with Schedule A of the Regulations.)

- The Company shall promptly disclose **Unpublished Price Sensitive Information (UPSI)** that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- The disclosure shall be uniform and shall ensure universal dissemination of **unpublished price sensitive information** to avoid selective disclosure.
- The Company shall promptly disseminate **unpublished price sensitive information** that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company shall give appropriate and fair response to the queries on news reports and requests for verification of market rumors by regulatory authorities.
- The Company shall ensure that information shared with analysts and research personnel is not **unpublished price sensitive information**.
- The Company will 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.
- The Company will handle all **unpublished price sensitive information** on a need-to-know basis.
- Legitimate Purposes:
Legitimate purposes shall mean sharing of **UPSI** in the ordinary course of business with banks, auditors, legal advisors and professionals provided that such sharing has not been carried out to evade or circumvent the prohibitions of these Regulations.
- A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.
- Any person in receipt of **unpublished price sensitive information** pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of Regulations and such persons are also required to ensure the confidentiality of **unpublished price sensitive information** shared with them, in compliance with Regulations.
- Mr. Kishore Chatnani, Whole-time Director & CFO is designated as Chief Investor Relations Officer (CIO) of the Company, to deal with dissemination of information and disclosure of **UPSI**.