

POLICY FOR PROCEDURE OF ENQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION ("UPSI")

[Under Regulation **9A**, Sub-regulation (5) of SEBI (Prohibition of insider Trading) Regulations, 2015)

1. All capitalized terms used in this Code but not defined herein shall have the meanings assigned to them under the SEBI (Substantial Acquisition and Takeover) Regulations, 2011 ("the Regulations"), the Companies Act, 1956 or Companies Act, 2013, as the case may be.
2. An employee or an Insider or a Designated Person of the Company, upon becoming aware of an actual or suspected leak of Unpublished Price Sensitive ("UPSI") of the Company, shall promptly inform of the same to the Compliance Officer.
3. In case of an actual leak, the Compliance Officer shall promptly inform the stock exchanges about the UPSI in the manner required under Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
4. The Compliance Officer, along with the Chief Internal Auditor will conduct an enquiry immediately upon becoming aware, either on their own or by way of information from any person including an unknown person and by way of a report under the Whistleblower Policy of the Company, of an actual or suspected leak of an UPSI, will promptly conduct and submit a report to the Directors of the Company and SEBI about the leak, the enquiries and the result in such format as may be deemed fit. The Compliance Officer and the Chief Internal Auditor may take support of any employee or third person under strict obligations of confidentiality to conduct such enquiry. Under the Regulations, it is the responsibility of any Fiduciary or Intermediary to cooperate in such enquiry process.
5. The Board of Directors will take such actions including penal actions against the offender(s) as may be deemed appropriate and required by law upon receipt of the enquiry report. Such penal action may include wage freeze, suspension, recovery, termination of employment contract agreement etc.

Approved by the Board of Directors 30th March, 2019 Subsequent modification(s) / amendment (s) to SEBI (Prevention of insider trading) Regulations, 2015 shall automatically apply to this Policy.