

MANGALAM CEMENT LIMITED

Regd. Office: Adityanagar 326520, Morak, Dist. Kota, Rajasthan

CIN: L26943RJ1976PLC001705

This code shall come into force w.e.f. 01st April, 2019

CODE OF PRACTIC AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Board of Directors has appointed Shri Manoj Kumar, the Company Secretary (*Compliance Officer*) as the Chief Investor Relations Officer, for the purpose of this Code to deal with dissemination of information and disclosure of unpublished price sensitive information.

I. The Compliance Officer shall ensure the following:

- i. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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;
- ii. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure;
- iii. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
- iv. Appropriate and fair response to queries on news reports and requests for verification of market rumors by Regulatory Authorities;
- v. Ensuring that the information shared with analysts and research personnel is not Unpublished Prices Sensitive Information.
- vi. Developing 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.
- vii. Handling of all Unpublished Price Sensitive Information on a need-to-know basis.

II. Sharing of Unpublished Price Sensitive Information for legitimate purpose:

The Unpublished Price Sensitive Information shall be shared by any person(s) authorized by the Board of Directors or Chief Investor Relations Officer of the Company in this behalf, only in furtherance of legitimate purpose(s) which shall include the following;

- i. Sharing of Unpublished Price Sensitive Information where such communication is in furtherance of performance of duty (ies);
- ii. Sharing of Unpublished Price Sensitive Information in the ordinary course of business by any Insider, Designated Person, or by any Authorized person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.
- iii. Sharing of Unpublished Price Sensitive Information for discharge of legal obligation(s).
- iv. Sharing of Unpublished Price Sensitive Information for any other genuine or reasonable purpose as may be determined by the Chief Investor Relations Officer of the Company.
- v. Sharing of Unpublished Price Sensitive Information for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

Provided that such sharing should not be carried out to evade or circumvent the prohibitions of PIT Regulations.
