



DILIP BUILDCON LIMITED
INFRASTRUCTURE & BEYOND

Code of Practices and Procedures for Fair Disclosure of unpublished Price Sensitive Information (UPSI)

Background:

Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 mandates a listed Company to formulate a "Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information" in adherence to the principles set out in Schedule A to the said Regulations and publish it on Company's official website.

In this regard, Dilip Buildcon Limited ("DBL") has framed a code as under for adhering the principles set out in Schedule A of Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015:

1. Chief Investor Relations Officer:

Company Secretary & Compliance Officer of the Company has been appointed as Chief Investor Relations Officer, who shall act as the Chief Investor Relations Officer for the purpose of dealing with dissemination of Information and disclosure of UPSI as contained herein.

2. Prompt Disclosure:

The Company shall ensure to make prompt public disclosure of unpublished price sensitive information that would impact price discovery, as soon as credible and concrete information comes into being in order to make such information generally available i.e. to make the information accessible to the public on a non-discriminatory basis.

3. Uniform and Universal Dissemination:

The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure of the same.

Unpublished price sensitive information shall be immediately disclosed / disseminated to Stock Exchanges so that the information is generally available through publication on the website of stock exchanges. It will be ensured that no selective disclosure of unpublished price sensitive information is made by making prompt, uniform and universal dissemination of unpublished price sensitive information.

In case unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise, Chief Investor Relations Officer shall ensure that such information is promptly disseminated to make such information generally available through publication on the website of stock exchanges.

4. Response to news reports

The Company shall ensure that appropriate and fair response is given to queries on news reports requests for verification of market rumors by regulatory authorities.



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5. Sharing of information with analysts and research personnel:

Whenever research analyst / research personnel meet or call is organised, Chief Investor Relations Officer shall be informed about such meet / call to ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

And Company is developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website of the Company to ensure official confirmation and documentation of disclosures made, unless such Unpublished Price Sensitive Information is generally available information.

6. Chinese-walls

Personnel working in concerned departments of the Company which are handling unpublished price sensitive information should not share such unpublished price sensitive information with personnel of other departments of the Company or with outsiders except on a need-to-know basis.

For Dilip Buildcon Limited

Managing Director



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