

(Effective w.e.f. May 15, 2015)

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

SCOPE

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) is adopted by Hindusthan Urban Infrastructure Limited (“The Company”). This Code is in compliance with 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.

CODE

1. The Company will make prompt public disclosure of unpublished price sensitive information in relation to the Company that would impact price discovery of the securities of the Company no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will ensure uniform and universal dissemination of unpublished price sensitive information in relation to the Company via stock exchanges where the securities of the Company are listed and in order to avoid selective disclosure.
3. The designated Company Secretary shall act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information in relation to the Company.
4. The Company will make efforts to promptly disseminate any unpublished price sensitive information in relation to the Company that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will endeavor to provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information in relation to the Company.
7. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the Company’s website www.hindusthanurban.com to ensure official confirmation and documentation of disclosures made. Details of quarterly concall and concall transcript, if any, with analysts and relating to investor relation conferences will be made available on the Company’s website.

8. The Company executives will handle all unpublished price sensitive information in relation to the Company on a need-to-know basis.

REVIEW/AMENDMENT

The Board of Directors of the Company may amend, abrogate, modify or revise any or all clauses of this Code in accordance with the applicable provisions of the Regulations, Listing Agreement entered into by the Company with the stock exchanges where the securities of the Company are listed and guidance note issued by such stock exchanges, from time to time. However, amendments in the Regulations shall be binding even if not incorporated in this Code.