

## **HINDUSTAN TIN WORKS LIMITED**

### **Code of practices and procedures for fair disclosure of unpublished price**

#### **Introduction**

- The Securities and Exchange Board of India ("SEBI") notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations"), which is effective from May, 15, 2015.
- Pursuant to Regulation 8 of the Regulations, Hindustan Tin Works Limited is required to formulate a code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Fair Disclosure Code").
- Accordingly, the Board of Directors of Company has formulated the Fair Disclosure Code.

#### **Scope**

- Hindustan Tin Works Limited endeavors to preserve the confidentiality of Unpublished Price Sensitive Information (UPSI) and to prevent its misuse. To achieve these objectives, and in compliance with the aforesaid Regulations, our Company has adopted this Fair Disclosure Code.
- This Code ensures timely and adequate disclosure of UPSI which would impact the price of its Securities and to maintain uniformity, transparency and fairness in dealing with all its stakeholders.
- Our Company is committed to timely and accurate disclosure based on applicable legal and regulatory requirements.

#### **Terms and Definition**

Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, The Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be or in any amendment thereto.

#### **Principles of Fair Disclosure**

The Company shall adhere to the following principles for fair disclosure of Unpublished Price Sensitive Information:

- Prompt Public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- Uniform and universal dissemination of UPSI to avoid selective disclosure.
- Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- That the information shared with analysts and research personnel is not UPSI.
- 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.
- Handling of all UPSI on a need-to-know basis.
- Ensuring compliance with the Listing provisions and other applicable statutes and provisions and

The Compliance officer of the Company shall deal with the dissemination of information and disclosure of UPSI.