



CIN : L51900MH1984PLC033082  
Registered Office Address : 422,  
Tulsiani Chamber, Nariman Point,  
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## CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This Code has been formulated by INERTIA STEEL LIMITED in pursuance of Regulation 8 (1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations"). The Code is effective from 15<sup>th</sup> May, 2015.

### DEFINITIONS:

- I. "Chief Investor Relations Officer" means the Compliance Officer or any other officer of the Company designated by the Board of Directors of the Company.
- II. "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis.
- III. "Unpublished-price sensitive information" ("UPSI") means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
  - (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - (v) change in key managerial personnel; and
  - (vi) material events in accordance with the listing agreement.

The Company shall adhere to the following practices and procedures to ensure timely and adequate disclosure and proper handling of unpublished price sensitive information which is likely to affect price of the securities:





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- 1) The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- 2) The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 3) The Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosures of unpublished price sensitive information.
- 4) The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5) The Company shall render appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- 7) The Company shall develop and pursue the 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.
- 8) The company shall ensure effective handle of all unpublished price sensitive information on a need-to-know basis.

The code may be suitably amended or modified by the Board of Directors of the Company from time to time to ensure fair disclosure and proper handling of unpublished price sensitive information.

Pursuant to the provisions of Regulation 8(1) and (2) of the said Regulations this Code shall be published on the official website of the Company and shall be intimated to the Stock Exchange where the securities of the Company are listed.

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