

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information/ Material Non-Public Information.

Nomura Capital (India) Private Limited

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## **Preamble**

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information / Material Non-Public Information (MNPI) ("Code") is framed pursuant to Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

## **Objective**

The objective of this Code is to formulate a framework for fair disclosure of Unpublished Price Sensitive Information (UPSI)/ Material Non-Public Information (MNPI) in regards to the Company's Non-Convertible Debentures (NCDs) listed on the National Stock Exchange of India Limited.

## **Chief investor relations officer**

The Company has designated Mr. Kishore Iyer as the Chief Investor Relations Officer (CIRO) for the purposes of this Code and the Insider Trading Regulations. The CIRO shall deal with the dissemination of information and disclosure of UPSI/ MNPI.

## **Disclosures Principle**

The CIRO shall be responsible to ensure:-

- (i) Prompt public disclosure of UPSI/ MNPI that would impact price discovery shall be given by the Company to Stock Exchanges on immediate basis.
- (ii) Uniform and universal dissemination of UPSI/ MNPI is made to avoid selective disclosure.
- (iii) Prompt dissemination of UPSI/ MNPI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (iv) Appropriate and fair response to queries on news report and request for verification of market rumors, if any by regulatory authorities.
- (v) That information shared with analysts and/or research personnel, if any, is only public information not UPSI/ MNPI.

The CIRO shall additionally ensure that after such meet/call and other investor relations conferences, transcripts or records of proceedings of meetings are uploaded on the official website of the Company at the earliest.

## **Handling of UPSI/ MNPI**

Employees, directors and insiders of the Company are required to ensure that they handle UPSI/ MNPI on a "need to know" basis and in line with the Securities Dealing Rules Policy adopted by the Company.

## **Communication of this Code**

A copy of this Code and every amendment thereto shall be promptly intimated to the Stock Exchanges. This Code shall also be posted on the website of the Company.

## **Modification and Amendments**

The Company reserves the right to modify and/or amend this Code at any time. Any amendment(s) to this Code shall be promptly intimated to Stock Exchanges where the NCDs of the Company are listed.