

VEEJAY LAKSHMI ENGINEERING WORKS LIMITED  
CIN: L29191TZ1974PLC000705

## **Code for Practices and Procedures for Fair disclosure of Unpublished Price Sensitive Information (UPSI).**

### **Corporate Disclosure Policy**

The Corporate Disclosure Policy/norm to be followed by the Company to ensure timely and adequate disclosure of price sensitive information is as follows.

### **Prompt disclosure of price sensitive information**

1. Disclosure of UPSI shall be done promptly when credible and concrete information is available for making the same generally available.
2. The Company will endeavour to make uniform and universal dissemination of UPSI and will avoid making selective disclosure once the information is ready to be made generally available. Material events will be disseminated as mandated by SEBI and the stock exchange in the Listing Agreement as amended from time to time.
3. In case the Company is required to make selective disclosure of UPSI, then the information will be promptly disseminated either in the form of notification to stock exchanges, press releases or upload of information on the website of the Company.
4. UPSI handling will be on a need to know basis for legitimate purposes only.
5. It is desirable to consider ways of supplementing information released to stock exchanges by improving investor access to the public announcements.

### **Overseeing and co-ordinating disclosure**

1. The Managing Director is designated as the Corporate Disclosure Officer (CDO) to oversee corporate disclosures. The CFO is designated as the Chief Investor Relations Officer (CIO) to deal with dissemination of information and disclosure of UPSI.
2. CIO shall be responsible for ensuring that the company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media, and educating staff on disclosure policies and procedure.
3. Information disclosure/dissemination shall normally be approved in advance by the CDO.
4. If information is accidentally disclosed without prior approval, the person responsible shall inform the CIO immediately, even if the information is not considered price sensitive.

**Responding to market rumours**

1. Any queries or requests for verification of market rumours by exchanges should be forwarded immediately to the CIO who shall decide on the response / clarification.
2. The CIO shall decide whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.
3. The Company will, subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumours by regulatory authorities.
4. As a general practice, if the rumour appears in a responsible media channel which has reasonably wide audience and rumour can have material impact on pricing of securities, then the Company would immediately make a proper announcement to present the correct position.

**Timely Reporting of shareholdings/ownership and changes in ownership**

Disclosure of shareholdings/ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Securities and Exchange Board of India Act and the Listing Agreement shall be made in a timely and adequate manner.

**Disclosure/dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors**

It shall be ensured that no unpublished price sensitive information is shared with analysts and research personnel. The Company will make transcripts or records of the proceedings of the meetings with Analysts and on Investor Relation and make them available on the website of the Company promptly.

**Medium of disclosure/ dissemination**

Disclosure/ dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.

CIO shall ensure that disclosures to stock exchanges are made promptly and are also made available in the company website.

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