

## **Johnson Controls-Hitachi Air Conditioning India Limited**

### **Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information**

#### **Purpose:**

Company has formulated Code of Conduct for Insider Trading under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992. SEBI has replaced said regulations by enacting Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

This Code of Conduct is formulated under Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, regarding Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information.

#### **Principles of Fair Disclosures:**

- A. Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- B. Selective disclosure will be avoided. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information will be made.
- C. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, such information will generally be made available.
- D. It will be ensured that information shared with analysts and research personnel is not unpublished price sensitive information.
- E. In case of meetings with analysts and other investor relations conferences, best practices will be developed to make transcripts or records of proceedings on the official website to ensure official confirmation and documentation of disclosures made.
- F. All unpublished price sensitive information will be available to employees or intermediaries on a need-to-know basis.

#### **Disclosures of Information to Analysts, Investors, Research Personnel and Brokers**

The Company shall ensure that the following guidelines are followed while dealing with analysts and institutional investors.

The Company will ensure that no UPSI is disclosed selectively to any one or group of research analysts, investors, Research Personnel and brokers to the disadvantage of other stakeholders. The Company shall carefully deals with questions that raise price sensitive information.

Disclosure and dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination. All disclosures to the stock exchanges will be made promptly. The Company shall also disclose information on website of the Company.

**Chief Investor Relations Officer:**

Mr. Gurmeet Singh, Managing Director has been designated as a chief investor relations officer who will deal with dissemination of information and disclosure of unpublished price sensitive information.

**Response to Queries on News Reports and request for verification of Market Rumours:**

On receipt of query from Stock exchanges on News Reports and / or requests from stock exchanges for verification of market rumours, the Compliance Officer shall ascertain the factual position and respond to such queries or requests.

At the time of making such response, the Compliance Officer may decide as to whether a public announcement is necessary for verifying or denying rumours and then make the disclosure.