



Nagarjuna Construction Company Limited



"In here, insider trading has a whole new meaning."

## Insider Trading Code & Compliance

## FAQ's on Insider Trading Policy of NCC

1. **What** is this policy : **Code of Conduct** For Prevention Of Insider Trading
2. **Why** this policy : **For ensuring** compliance of applicable provisions of the SEBI (Insider Trading) Regulations, 1992, amended from time to time
3. **Who** are covered :
  - i) All Directors on the Board of the Company
  - ii) Designated Employees of the Company **i.e.**,
    - Divisional Heads
    - Functional Heads
    - Senior Officials in the rank of Vice President and above
    - All officials of the rank of Manager and above in the Finance, Accounts and Secretarial Departments based at Head Office
    - Other employees designated by the Managing Director from time to time
4. **What** is our concern : **As an insider** in NCC and as a designated employee of NCC having an access to unpublished price sensitive information maintain confidentiality and not to use the same for personal interests
5. **When** is it applicable : **Applicable for** dealing in securities of the Company (either buy/sell or otherwise deal in any manner as principal or agent)
6. **How** to comply : **Adherence to** do's and don'ts/  
Check with the Company Secretary in case you require any clarifications

## Do's

- **On the date of coming into force of this amended code i.e. 28.05.2009 all Directors and Designated Employees covered under this Code to submit the initial disclosure in Form B duly filled in & signed to the Company Secretary at Head Office.**
- **On joining NCC, submit the initial disclosure in Form-B to the Company Secretary regarding your (including dependant family members) holding in NCC shares**
- **Maintain confidentiality of any price sensitive information available**
- **Deal in shares of NCC only when trading window is open**
- **Check with the Company Secretary based at Head Office for any information on compliance with this code**
- **Obtain pre-clearance for transactions exceeding 25000 shares of NCC in the aggregate in a calendar month (either by self/ dependent family members) by submitting Form-A to the Company Secretary at Head Office.**
- **Disclose on continuous basis of any change in your / dependent family members holding in NCC's shares (exceeding 25000 shares in number or Rs.5 Lakhs of the value of the shares traded or 1% of the paid up share capital the Company (whichever is lower) with in two days of such transaction/change by submitting duly filled and signed Form-D to the Company Secretary and the Stock Exchanges.**
- **Submit the annual disclosures in Form-C to the Company Secretary on or before 30<sup>th</sup> April of every year.**

## Don'ts

- **Un-published Price Sensitive Information is to be handled on a need-to-know basis, and do not disclose or pass on such information available with you except to the extent of official use within the company to discharge your duties.**
- **Do not deal in shares of NCC exceeding 25,000 shares in the aggregate in a calendar month either for self or for dependent family members without pre-clearance from the Company Secretary**
- **Do not deal in shares of NCC when trading window is closed (during prohibited period)**
- **Do not enter into an opposite transaction i.e. those who buy/ sell any number of shares of NCC shall not enter into an opposite transaction during the next six months following the prior transaction**
- **Do not hold/take positions in F&O/ Derivative transactions in the shares of NCC at any time**

*For the purpose of this code.*

**Coverage is for -**

- i) All Directors on the Board of the Company
- ii) Designated Employees of the Company **i.e.**,
  - Divisional Heads
  - Functional Heads
  - Senior Officials in the rank of Vice President and above
  - All officials of the rank of Manager and above in the Finance, Accounts and Secretarial Departments based at Head Office
  - Other employees designated by the Managing Director from time to time

- **Dependent family member** means employee's spouse, dependant children and dependant parents
- **Price Sensitive** Information means any information is likely to materially affect the share price of the NCC
- **Trading Window** means a period other than the prohibited period
- **Prohibited period** refers to the Period of Commencing five working days prior to the date of Board Meeting and ending after 24 hours from the time of such information is made public
- **Pre-Clearance** means clearance from Company Secretary based at Head Office.
- **In case any clarifications** are required regarding the Code of Conduct For Prevention Of Insider Trading , please get in touch with the Company Secretary at Head Office at the following Address:

Plot No.13/17,  
 Laxmi Towers,  
 2<sup>nd</sup> Floor,  
 Nagarjuna Hills,  
 Punjagutta,  
 Hyderabad-500082  
**Email-Id:**[srinivasamurthy.mv@nccltd.in](mailto:srinivasamurthy.mv@nccltd.in)  
[ho.secr@nccltd.in](mailto:ho.secr@nccltd.in)  
**Ph: 040-23255200**

- **The detailed code is accessible on the NCC website i.e., [www.ncclimited.com](http://www.ncclimited.com)**

