

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

**(PURSUANT TO REGULATION 8(1) OF SEBI (PROHIBITION OF INSIDER TRADING)
REGULATIONS, 2015)**

EFFECTIVE FROM 15TH MAY 2015



ELECTROSTEEL STEELS LIMITED ('ESL') shall adhere to the practices and procedures detailed in this Fair Disclosure Policy document, effective May 15, 2015, in order to ensure fair disclosure of events and occurrence that could potentially impact price of listed securities of the Company in the market.

The Company shall follow the Principles of Fair Disclosures detailed hereunder:

1. To promptly make public disclosure of unpublished price sensitive information (herein after called '**UPSI**') that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Compliance Officer to be Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
4. To promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. To make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not UPSI.
7. To develop 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. To handle all UPSI on a need-to-know basis.

This Fair Disclosure Policy document adopted in line with the principles set out in Schedule A of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 has been approved by the Board of Directors of the Company and shall be applicable and binding on

- (1) All Directors
- (2) Key Managerial Personnel
- (3) Senior Management Level i.e. one level below the Board as may approved from time to time.;
- (4) All executives working with the departments of Company Secretariat, Finance and Accounts and
- (5) Any other executive as may be determined and informed by the Company from time to time