

C&C CONSTRUCTIONS LTD.

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[FRAMED UNDER REGULATION 8 (1) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015]

Scope:

The Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information (Code) is adopted by C & C Constructions Ltd. (the Company). This Code is in compliance of Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations) read with Schedule A of the Regulations, as amended from time to time. The Code also includes Policy for determination of “legitimate purpose” in compliance with Regulation 3 (2A) of the Regulations.

Code:

1. C&C Constructions Limited (C&C/ Company) will promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such Disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The disclosure shall be made to National Stock Exchange of India Ltd. (NSE) and BSE Ltd. (BSE) and simultaneously upload such information on Company’s official website in order to make such information generally available to investors and members of the Company.
3. Selective Disclosure of Unpublished Price Sensitive Information (UPSI) shall be avoided.
4. C&C’s Company Secretary serves as Chief Investor Officer to take all required action in consultation with CFO/MD and Chairman of the Board, for dissemination of information and disclosure of unpublished price sensitive information indiscriminately.
5. In the event of inadvertent selective disclosure of un-published price sensitive information, prompt action shall be taken to ensure such information is generally available.
6. Appropriate assistance and fair response shall be provided to regulatory authorities for verification of news reports or market rumors.
7. C&C shall further ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

8. C&C shall take reasonable steps, to make generally available, any discussion on unpublished price sensitive information at the meeting of analyst or investors relations.
9. Unpublished Price Sensitive Information shall be handled on a "need to know" basis, i.e., Unpublished Price Sensitive Information shall be disclosed only to those within the C&C who need the information to discharge their duty.

Policy for Determination of Legitimate Purpose

UPSI may be communicated or provided or allowed access to, only where such communication is in furtherance of legitimate purpose, performance of duties or discharge of legal obligations.

The term 'legitimate purpose' shall include sharing of UPSI in the ordinary course of business with the Company's partners, collaborators, lenders including prospective lenders, customers, suppliers, merchant bankers, legal advisors, auditors, credit rating agencies, potential investors, insolvency professionals and other advisors, service providers or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.

Whether sharing of UPSI for a particular instance is pursuant to 'legitimate purpose' or not would entirely depend on the specific facts and circumstances of each case. Primarily, the following factors should be considered while sharing the UPSI:

1. Whether sharing of such UPSI is in the ordinary course of business of the Company or for discharge of legal obligations;
2. Whether sharing of UPSI is in the interest of the Company or in furtherance of genuine commercial purpose;
3. Whether the nature of UPSI being shared is commensurate to the purpose for which access is sought to be provided to the recipient.

Any person in receipt of UPSI pursuant to legitimate purpose shall be considered 'Insider' for the purpose of these Regulations and due notice shall be given to such person to maintain confidentiality of such UPSI in compliance with the Regulations.

Review/Amendment

The Board of Directors of the Company may amend, abrogate, modify or revise any or all clauses of this Code in accordance with the applicable provisions of the Regulations, The Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and guidance note issued by such stock exchanges, from time to time. In case any provision(s) of this Code is contrary to or inconsistent with the provision(s)

of the applicable laws, the provision(s) of the applicable laws shall prevail. Further, amendments in the applicable laws shall be binding even if not incorporate in this Code.