

## LIC HOUSING FINANCE LIMITED

### CORPORATE DISCLOSURE POLICY

The purpose of this Corporate Disclosure Policy of LIC Housing Finance Limited is to set out policy to ensure that:

- The Company complies with its timely disclosure obligations as required under applicable laws (under SEBI regulations);
- Compliance with Regulation 8 read with Schedule A of the Regulations, requiring every listed company to frame a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the 'Code') in order to make 'Unpublished Price Sensitive Information' (hereinafter referred to as 'UPSI') generally available.
- Documents (i.e. press release or any written communication including a communication prepared and transmitted in electronic form) or public oral statements made by a person with actual, implied or apparent authority to speak on behalf of the Company that relates to the business and affairs of the Company do not contain a misrepresentation i.e. an untrue statement of a material fact or an omission to state a material fact that is required to be stated or that is necessary to make a statement not misleading in the circumstances in which it is made.

#### **1 Corporate Disclosure Policy:**

Price sensitive information shall be given to the Stock Exchanges and disseminated promptly on a continuous basis. For this purpose Price Sensitive Information means any information, which relates directly or indirectly to a company and which if published is likely to materially affect the price of shares of the Company. The following shall be deemed to be Price Sensitive Information:

- i. Periodical financial results of the company;
- ii. Intended declaration of dividend (both interim and final);
- iii. Issue of securities or buy back of securities;
- iv. Any major expansion plan;

- v. Amalgamation, mergers or takeovers;
- vi. Disposal of the whole or substantial part of the undertaking;
- vii. Significant changes in the policies, plans or operations of the company.

## **2 Procedure for responding to any queries or request by Stock Exchanges for verification of market rumors:**

Replies to all queries or requests for verification of market rumours shall be sent only after obtaining the approval of the Chairman or MD & CEO. In the absence of the Chairman / MD & CEO, the reply can be sent only with approval of the Committee of Company Officials formed by MD & CEO.

Such reply shall be signed by the Company Secretary who is also the Compliance Officer. In the absence of the Company Secretary such replies shall be signed by CFO or other HOD as may have been authorized in this regard. ***Such officer signing the reply as mentioned above shall be considered as the Chief Investor Relations Officer for the said reply.***

***The Officer providing the reply as mentioned above shall provide appropriate and fair responses to queries in relation to Unpublished Price Sensitive Information including any news reports, if any. A 'No Comment Practice' must be maintained by the Company and the abovementioned officer(s) on market rumours except when requested by any regulatory authorities to verify such rumours.***

A copy of such replies shall also be sent to other Stock Exchanges where shares of the company are listed. Such replies shall also be kept on the website of the company.

Replies to such queries shall be sent on priority basis preferably within 2 working days hours from the time of receipt of such query or request. The date and time of receipt of such queries / request shall be recorded.

The Company Secretary shall oversee corporate disclosure. He shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

### **3 Overseeing and coordinating disclosure:**

The Compliance officer i.e. the Secretary shall be responsible for ensuring that the company complies with the continuous disclosure requirements.

### **4 Procedure for disclosure / dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors etc.:**

No information shall be passed by Specified Persons / Connected Persons by way of making a recommendation for the trading in securities for purchase or sale of securities of the Company.

Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information i.e. generally available information accessible to the public on a non-discriminatory basis to be provided.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet to the Stock Exchange and on the Company's website.

### **5 Procedure for posting of Corporate Disclosure in company's website:**

The following information shall be continuously disclosed in the company's website:

Intimation regarding date of Board meeting in which the company approves the unaudited quarterly/half yearly financial results, audited annual financial results and dividend.

Unaudited quarterly and half yearly financial results and audited annual financial results. Details of dividend recommended by the Board

Details of turnover, PBDIT, Depreciation, Interest, PAT etc.

AGM date etc.

Book closure and record date

Disclosure made to Analysts and Institutional Investors

Information furnished to the Stock Exchanges under continuous disclosure requirement. The Company Secretary shall oversee the disclosures made in the company's website.

#### **6 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 act and the listing agreement shall be made in a timely and adequate manner.

This policy has been framed in pursuance to the Regulation contained in clause 12(2) of Chapter IV of SEBI (Prohibition of Insiders Trading) Regulations, 1992 inserted by the SEBI (Insider Trading) (Amendment) Regulations, 2002.

#### **7. Third Party Dealings**

***In order to avoid misrepresentation or misquoting, endeavour shall be made that at least two representatives of the Company are present in the meetings or conference calls with analysts, brokers or institutional investors. The transcripts of aforesaid conference calls or record of the proceedings of the meetings shall be made available on the website of the Company to ensure official confirmation and documentation of the information shared during such meetings and conference calls.***

#### **Extract of Sections 15G and 24 the SEBI Act, 1992**

15G. Penalty for insider trading

If any insider who,—

(i) either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price-sensitive information; or

(ii) communicates any unpublished price-sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or

(iii) counsels, or procures for any other person to deal in any securities of any body corporate on the basis of unpublished price-sensitive information, shall be liable to a penalty which shall not be less than ten lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher.

## **24 Offences**

(1) Without prejudice to any award of penalty by the adjudicating officer under this Act, if any person contravenes or attempts to contravene or abets the contravention of the provisions of this Act or of any rules or regulations made thereunder, he shall be punishable with imprisonment for a term which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both.

(2) If any person fails to pay the penalty imposed by the adjudicating officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month but which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both.