

BIGBLOC CONSTRUCTION LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for adhering to the Principles of Fair Disclosure

As required under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, which stand further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (hereinafter referred to as "the Regulations"), Bigbloc Construction Limited, hereby notifies the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for adhering to the Principles of Fair Disclosure" (hereinafter referred to as "the Code").

The Code intends to formulate a framework and policy for fair disclosure of events and occurrences that would impact price discovery in the market for the securities of the Company. To achieve this objective, the Board of Directors shall adhere to the principles of fair disclosure mentioned hereunder in letter and in spirit, to ensure fair disclosure of events and occurrence that could impact price of its securities in the market.

- (1) The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- (2) The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- (3) Unless otherwise appointed by the Board of Directors, the Chief Financial Officer shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- (4) The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (5) The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (6) The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
- (7) The Company will develop best practices to make available transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- (8) All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of legal obligations.
- (9) Sharing of unpublished price sensitive information in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants shall be considered as "legitimate purposes" provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- (10) Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an "Insider" for purposes of the Regulations and due notice shall be given to such person to maintain confidentiality of such unpublished price sensitive information in



compliance with the said Regulations. Such person is also required to ensure the confidentiality of unpublished price sensitive information shared with him/her, in compliance with the Regulations.

- (11) Unpublished price sensitive information as defined should be disclosed only to those who need such information to discharge their duties or legal obligations by virtue of their respective role and function, whose possession of such information will not give rise to a conflict of interest or appearance of misuse of such information.
- (12) Adequate and effective internal controls will be laid out including entering into Non-Disclosure Agreements with connected persons to ensure the confidentiality of unpublished price sensitive information in compliance with the Regulations.
- (13) The Chief Financial Officer, subject to the approval of Board of Directors, reserves the right to modify or amend the Code in whole or in part.
- (14) The Board of Directors may establish further rules and procedures, from time to time, to give effect to the intent of this Code. The decision of the Board of Directors with regard to all matters relating to the Code will be final and binding.
- (15) The Code shall be published on the official website of the Company. Further, this Code and every subsequent amendment made thereto, shall be promptly intimated to the stock exchange where the securities are listed.

