



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UNPUBLISHED PRICE SENSITIVE INFORMATION**

L&T TECHNOLOGY SERVICES LIMITED



L&T Technology Services Limited

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Preamble

Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 requires the Board of every company whose securities are listed on a stock exchange to formulate and publish on its website, a code of practices and procedures for fair disclosure of unpublished price sensitive information (the "Code").

In pursuance of the above, the Board of Directors of L&T Technology Services Limited (the "Company"), vide their resolution dated September 22, 2016, effective from September 23, 2016, have formulated the Code in order to ensure timely and adequate public disclosure of unpublished price sensitive information. In view of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 ("the PIT Regulations") effective from 1st April 2019, the Code has been amended to include a policy for determination of "legitimate purposes".

The Company will adhere to the following so as to ensure timely and adequate disclosures of Unpublished Price Sensitive Information with respect to it or its securities which is likely to affect price of the securities: -

- a. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b. The Company will make uniform and universal dissemination of unpublished price sensitive information in order to avoid selective disclosure.
- c. The Chief Financial Officer is hereby designated as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- d. The Company will ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available, as it deems fit.
- e. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- g. The Company will make transcripts or records of proceedings of meetings with analysts and other investor relations conferences related to quarterly and annual financial results are hosted on the website of the Company, to ensure official confirmation and documentation of disclosures made.
- h. The Company will handle all unpublished price sensitive information on a need-to-know basis.



Sharing of Unpublished Price Sensitive Information (UPSI) for Legitimate Purpose:

“Legitimate Purposes” would include information shared for the purposes mentioned hereunder:

- Sharing of information, in furtherance of duties in ordinary course of business with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, consultants, etc.
- Sharing of information for execution of specific projects
- Sharing of information in discharge of legal obligations
- Sharing of information in accordance with the Company’s Communication & Disclosure Policy
- Sharing of information for market sounding purposes to intermediaries and fiduciaries to obtain feedback from potential / existing investors about a transaction involving the Company.
- Sharing of information for any genuine or reasonable purpose as may be determined by the Chief Investor Relations Officer (CIRO).

Provided that sharing of such UPSI has not be carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations

Review & Amendment:

The Policy shall be reviewed as and when required to ensure that it meets the objectives of the relevant regulation and remains effective. The Chief Executive Officer & Managing Director and any one of the Chief Financial Officer or Company Secretary have the right to change/amend the policy at any time at his discretion and the new policy shall be displayed to the stakeholders