



"In here, insider trading has a whole new meaning."

# Insider Trading Code & Compliance

**M.V.Srinivasa Murthy**  
**Company Secretary & Sr. VP (Legal)**  
**(Compliance Officer )**

**NCC**

# FAQ's on Insider Trading Policy of NCC



1. **What** is this policy : **Code of conduct for prevention of insider trading**
2. **Why** this policy : **For ensuring** compliance of applicable provisions of the SEBI (Prohibition of )( Insider Trading) Regulations, 1992 as amended from time to time.
3. **Who** are covered : **All** Directors on the Board of the Company, Promoters and persons part of promoter group, Divisional Heads, Functional Heads and all the Employees of Finance & Accounts and Secretarial departments based at Head Office and such other employees decided by the MD from time to time
4. **What** is our concern : **As an insider** in NCC and as a designated employee of NCC having an access to unpublished price sensitive information maintain confidentiality and not to use the same for personal interests
5. **When** is it applicable : **Applicable for** dealing in securities (either buy/sell or deal in any manner as principal or agent) @ times of prohibited period / for pre- clearance on minimum threshold limit
6. **How** to comply : Adherence to do's and don'ts/ Check with the Compliance Officer

# Do's



1. On joining NCC, submit the initial disclosure in **Form-B** to the Compliance Officer regarding your (including dependant family members) holding in NCC shares
2. Maintain confidentiality of any price sensitive information available
3. Deal in shares of NCC only when trading window is open and as per provisions of Insider Code adopted by the Company
4. Check with the compliance Officer based at HO' for any information on compliance with this code
5. Obtain pre-clearance (exceeding 25000 shares in number) for dealing in securities (either by self/ dependant family members) in **Form-A**
6. Disclose on continuous basis of any change (exceeding 25000 shares in number or Rs.5 Lakhs of the value of the shares traded or 1% of the paid up share capital in number) in holdings of NCC shares with in two days of such transaction/change to the Compliance Officer in **Form-D** to the Company and the Stock Exchanges.
7. **Submit the annual disclosures in Form-C on or before 15<sup>th</sup> April of every year**

# Don'ts



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- 1. Do not deal in shares of NCC in self /dependant family members with out pre-clearance from the Compliance Officer**
  - 2. Do not deal in shares of NCC when trading window is closed (during prohibited period)**
  - 3. Do not enter into an opposite transaction- those who buy/ sell any number of shares of NCC shall not enter into an opposite transaction during the next six months following the prior transaction**
  - 4. Do not hold/take positions in F&O/ Derivative transactions in the shares of NCC at any time**

*For the purpose of this code-*

1. Coverage is for –All Directors on the Board of the Company, Promoters and persons part of promoter group, Divisional Heads, Functional Heads and all employees of Finance & Accounts and Secretarial departments located at Head Office and such other employees decided by the MD from time to time
2. Dependant family member includes employee's spouse, dependant children and dependant parents
3. Price Sensitive Information-information is likely to materially affect the share price of the NCC
4. Trading Window is period other than prohibited period
5. Prohibited period is five working days prior to the date of Board meeting while considering price sensitive information and ending after 24 hours from such information made public
6. Pre-Clearance- clearance from Compliance Officer
7. Compliance Officer is the Company Secretary at HO' NCC Limited at NCC House, Madhapur, Hyderabad – 500 081 reachable at [ho.secr@nccltd.in/](mailto:ho.secr@nccltd.in) Tele : 040-23268888
8. The detailed code will be accessible on the NCC website i.e, [www.ncclimited.com](http://www.ncclimited.com)
9. Necessary forms as a part of disclosure are prescribed under the code.

***Thanks for the compliance***