

Johnson Controls-Hitachi Air Conditioning India Limited

Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information

Purpose:

Company has formulated Code of Conduct for Insider Trading under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992. SEBI has replaced said regulations by enacting Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

This Code of Conduct is formulated under Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, regarding Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information.

Disclosures:

- a. Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Selective disclosure will be avoided. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information will be made.
- c. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, such information will generally be made available.
- d. It will be ensured that information shared with analysts and research personnel is not unpublished price sensitive information.
- e. In case of meetings with analysts and other investor relations conferences, best practices will be developed to make transcripts or records of proceedings on the official website to ensure official confirmation and documentation of disclosures made.
- f. All unpublished price sensitive information will be available to employees or intermediaries on a need-to-know basis.

Chief Investor Relations Officer:

Mr. Gurmeet Singh, Managing Director of the Company has been designated as a chief investor relations officer who will deal with dissemination of information and disclosure of unpublished price sensitive information.

Queries:

Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities will be responded promptly.