

# IndusInd Bank

April 1, 2019

**The Asst. Vice President  
Listing Department  
National Stock Exchange of India Ltd.**  
Exchange Plaza, 5<sup>th</sup> Floor  
Plot No.C/1, G Block  
Bandra-Kurla Complex  
Bandra (East), Mumbai - 400 051

**The Deputy General Manager  
Corporate Relationship Dept.  
BSE Ltd.**  
1<sup>st</sup> Floor, New Trading Ring  
Rotunda Building, P. J. Towers  
Dalal Street, Fort  
Mumbai - 400 001

**NSE Symbol: INDUSINDBK**

**BSE Scrip Code: 532187**

Madam / Dear Sir,


**Subject: Intimation under Regulation 8(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 ('PIT Regulations')**

We wish to inform that the Board of Directors of the Bank have approved the amendments to the "Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information" ('Fair Disclosure Code') in alignment with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

In compliance with Regulation 8(1) of the PIT Regulations, the Fair Disclosure Code has been uploaded on the Bank's website at [www.indusind.com](http://www.indusind.com).

Copy of the Fair Disclosure Code, which is effective from April 1, 2019, is enclosed.

Yours faithfully,  
**For IndusInd Bank Limited**

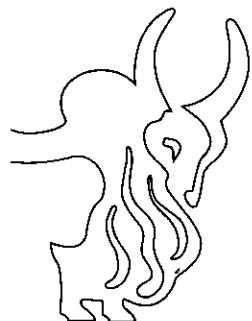


**Company Secretary**

Encl. A/a

IndusInd Bank Limited, Building No. 7, Solitaire Corporate Park, Andheri- Ghatkopar Link Road,  
Chakala, Andheri E, Mumbai - 400 093, India. Tel: (0022) 66412200

**Registered Office:** 2401 Gen. Thimmayya Road, Pune 411 001, India  
Tel.: (020) 2634 3201 Fax: (020) 2634 3241 Visit us at [www.indusind.com](http://www.indusind.com)  
CIN: L65191PN1994PLC076333



## **INDUSIND BANK LIMITED**

### **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

This Code is called 'IndusInd Bank Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' (the "Code") and is framed based on the principles outlined by the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"), as amended, read with BSE Circular No. LIST/COMP/16/2018-19 dated July 6, 2018.

It is hereby clarified that the Compliance Officer shall be responsible for ensuring that the Bank is at all times in compliance with the PIT Regulations.

It is hereby further clarified that terms not specifically defined in this Code shall have the same meaning ascribed to them in the PIT Regulations.

#### **Prompt public disclosure of Unpublished Price Sensitive Information ("UPSI")**

The Compliance Officer shall ensure prompt public disclosure of UPSI that would impact price discovery as soon as credible and concrete information comes into being in order to make such information "generally available", in terms of the Regulations.

#### **Uniform and Universal dissemination of UPSI**

The Bank is responsible for uniform and universal dissemination of UPSI in order to avoid selective disclosure and curtail misuse of UPSI by an Insider or any other connected persons.

It will be ensured that no selective disclosure of UPSI is made by making prompt, uniform and universal dissemination of UPSI.

#### **Chief Investor Relations Officer (CIRO)**

The Bank has designated Mr. Sanjay Mallik, Head - Investor Relations & Strategy, as the Chief Investor Relations Officer ('CIRO').

The CIRO shall be responsible for dissemination of information and disclosure of UPSI.

#### **Prompt dissemination of UPSI**

In case UPSI gets disclosed selectively, inadvertently or otherwise, CIRO shall ensure that such information is promptly disseminated in the public domain, i.e., on the website of the Bank / Stock Exchanges to make such information generally available.



### **Fair response to queries on News Reports**

The Bank shall ensure that appropriate and fair response is given to queries on news reports related to the Bank and requests for verification of market rumours by Stock Exchanges, as per the disclosure policy adopted by the Bank.

### **Information shared with Research Analysts or any Specific Persons**

The Employees, Directors and other connected persons shall ensure that information shared with analysts and research personnel is not UPSI.

The UPSI, if any, has been shared with analysts, the Compliance Officer shall take such steps so as to ensure dissemination of the same to the Stock Exchanges or on the website of the Bank, as the case may be, in order to make it "generally available" within the meaning of the PIT Regulations.

### **Publication of transcripts or records of proceedings of meetings with analysts**

The Bank hosts on its website the transcripts or records of proceedings of meetings with analysts and presentations shared with investors at investor meets / conferences to ensure official confirmation and documentation of the disclosure made.

The CIRO shall ensure that immediately after analyst meet / call, transcripts or records are made of proceedings of meeting with analyst / Investor conferences and the same have been uploaded on the official website of the Bank, to ensure official confirmation and documentation of disclosure made.

### **Handling of UPSI on a need-to-know basis**

Employees, Directors and any other Connected Persons are required to ensure that handling of all UPSI, including onward communication, is done strictly on a need-to-know basis and in line with the any other applicable codes, policies and procedures followed by the Bank, including, specifically, in this Code and the Insider Trading Code.

No UPSI shall be communicated by Employees, Directors and Insiders of the Bank to any person except in furtherance of his / her legitimate purposes, performance of duties or disclosure of his / her legal obligations.

It is hereby clarified that "*legitimate purpose*" means and includes sharing of UPSI in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants of the Bank, provided that such sharing of UPSI has not been carried out to evade or circumvent the provisions of the PIT Regulations.



### **Measures to deal with incidents of leakage of Price Sensitive / Material information**

- The Bank may make public disclosure of provisional figures as close to the quarter-end as possible so that the information becomes generally available.
- The Bank may choose to disseminate any material information / events where there is likelihood of crystallization of such events / information but finality has not been reached.

However, in the interest of Stakeholders, the CIRO may choose not to disclose material information / events related to Mergers, Acquisitions, Joint Ventures, Settlement of any one of the multiple labour disputes etc.

Confidentiality of Information withheld shall be maintained and no part is leaked, until it reaches finality and is made generally available.

The Bank shall take necessary steps to prevent leakage of material information / events withheld in interest of stakeholders, if the withheld information leaks, the CIRO shall as soon as such leakage of information is known ensure the information is disclosed and made generally available with a certain reasonable level of correctness.

- The Bank shall in the interest of stakeholders in events of rumours, misrepresentation or on observation of information leak in media (including social media) make appropriate and suitable disclosures through the Stock Exchanges.

The disclosures shall provide all such information as can be furnished without compromising the business interest of the Bank and the interest of stakeholders on suo motu basis without waiting for any query from Stock Exchanges in this regard.

- The Bank shall immediately disclose the confidential / material information to the Stock Exchanges in circumstances where the confidential / material information has been inadvertently disclosed to a third party.
- The Board of Directors of the Bank has formulated and approved 'Written policy and procedures in case of leakage and suspect of leakage of UPSI'.

Further, the Compliance Officer shall ensure that a structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.



## Website

As per the provisions of the LODR, this Code shall be disclosed on the website of the Bank. Further, the Bank shall disclose on its website all such events or information which has been disclosed to the stock exchange(s) under the LODR and such disclosures shall be made available on the website of the Bank for a period of at least five years and thereafter as per the internal policies of the Bank.

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