



# हिन्दुस्तान पेट्रोलियम कॉर्पोरेशन लिमिटेड

(भारत सरकार उपक्रम) रजिस्टर्ड ऑफिस : 17, जमशेदजी टाटा रोड, मुंबई - 400 020.

## HINDUSTAN PETROLEUM CORPORATION LIMITED

(A GOVERNMENT OF INDIA ENTERPRISE) REGISTERED OFFICE : 17, JAMSHEDJI TATA ROAD, MUMBAI - 400 020.

17, जमशेदजी टाटा रोड, पोस्ट बॉक्स नं. - 11041, मुंबई - 400 020. दूरभाष - 2286 3900 • फॅक्स - 2287 2992 • ई-मेल : corphqo@hpcl.co.in  
17, Jamshedji Tata Road, P. O. Box No - 11041, Mumbai - 400 020. Tel. : 2286 3900 • Fax : 2287 2992 • e-mail : corphqo@hpcl.co.in  
CIN No.: L23201MH1952GOI008858

Ref : Co.Secy/VM/122/2019

April 01, 2019

Director-Investor Services & Listing  
The Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai - 400 001 **Scrip Code: 500104**

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 **Scrip Name: HINDPETRO**

**Sub: Amendment to "The Code for  
Prohibition of Insider Trading  
in the Securities of HPCL".**

Dear Sir,

We write to inform you that the Board of Directors at its Meeting held on March 29, 2019 had approved the revision in "The Code for Prohibition of Insider Trading in the Securities of HPCL" in line with SEBI (Prohibition of Insider Trading) Regulations, 2015 and amendments thereto ("Regulations"). The Code shall be effective from April 01, 2019 and it covers the following:

1. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) and also Policy for Determination of "Insider Purposes" as a part of it.





## **CODE OF PRACTICES AND PROCEDURE FOR FAIR DISCLOSURES ON UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI).**

The Designated Persons of HPCL shall abide by the following principles of fair disclosures of UPSI for fair disclosure of events and occurrences that could impact the price discovery.



### **POLICY FOR DETERMINATION OF LEGITIMATE PURPOSE:**

The sharing of UPSI shall be deemed to be for "Legitimate Purpose" if it satisfies the following criteria:

- (i) The UPSI shall be shared with any person on 'need to know' basis
- (ii) The 'Legitimate purpose' shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers,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 or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- (iii) Insiders shall share the UPSI with the external agencies only in the interest of the Company and/or in compliance with the requirements of the law.
- (iv) Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "Insider" and due notice shall be given to such person to maintain confidentiality of UPSI in compliance with the Regulations.
- (vi) The Insider sharing UPSI shall ensure that such third party with whom the UPSI is shared, is also bound by non-disclosure or confidentiality agreements and the liabilities involved which shall mention the duties and responsibilities of such person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of the Code or Regulations.