

BHARAT COKING COAL LIMITED

[CIN – U10101JH1972GOI000918]

Regd. Office: Koyla Bhawan, Koyla Nagar, Dhanbad Jharkhand, India – 826005

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Designated Persons of the Company viz. Promoter, Director, KMP and designated employees shall abide by the following principles of fair disclosure of unpublished price sensitive information for fair disclosure of events and occurrences that could impact price discovery for its securities in the market:

1. Ensure that all Unpublished Price Sensitive Information that may impact the market price of the Company's securities shall be promptly made available in public domain.
2. Ensure that every person required to handle the Unpublished Price Sensitive Information enters the details of Unpublished Price Sensitive Information in the Structural Digital Database before sharing the same with any person, internally or externally.
3. Avoid selective disclosure of Unpublished Price Sensitive Information and ensure that all unpublished price sensitive information is disclosed uniformly and universally.
4. Ensure that any Unpublished Price Sensitive Information, which may have been disclosed selectively, inadvertently or otherwise, shall be promptly made available in public domain.
5. Ensure that appropriate and fair response is provided to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
7. Best practices be followed to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. All Unpublished Price Sensitive Information shall be handled on a need-to-know basis i.e. no Unpublished Price Sensitive Information shall be communicated to any person except in

furtherance of the legitimate purposes, performance of duties or discharge of his legal obligations.

9. Company Secretary of BCCL is designated as the “Compliance Officer” to deal with all matters relating to dissemination of information and disclosure of unpublished price sensitive information.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES:

1. Legitimate Purpose:

“Legitimate Purpose” shall mean sharing of UPSI in the ordinary course of business or on a need-to-know basis. The Company may share the UPSI if required in the interest of the Company.

2. The sharing of UPSI by an Designated Person shall be deemed to be for "Legitimate Purpose" if it satisfies the following criteria:

- i. The UPSI shall be shared only on 'need to know' basis.
- ii. Such sharing of UPSI shall be in the ordinary course of business such as performance of duties, discharge of legal obligations, etc. 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. The Designated Person 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.

3. Process for sharing UPSI:

The Designated Person shall conduct the following steps while sharing UPSI:

- i. Satisfy that information is UPSI and sharing is for legitimate purpose
- ii. Identify the persons with whom the information is to be shared
- iii. Notify the recipient that UPSI is being shared and enter into a confidentiality/non-disclosure agreement.

- iv. Mode of sharing UPSI shall be either by an email (address directly to the insider without copying) or hard copy or any other electronic mode or device or provide access to the information, data, server with acknowledgement.
- v. Maintain names of the persons along with PAN (or any other identifier where PAN is not available) who has shared the information and with whom information is shared and update the details in Structural Digital Database before sharing the same. The database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. This database shall be kept confidential.

POLICY FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. Leak or suspected leak of unpublished price sensitive information:

Every listed company must formulate written policy for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information.

2. Process to be followed in case of Leak or suspected leak of unpublished price sensitive information

As employees of the Company are bound to maintain strictest secrecy regarding Company's affairs, and in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information of the Company, appropriate inquiry will be initiated as per the Conduct, Discipline and Appeal Rules (CDA) of BCCL, on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information.