



December 31, 2020

BSE Limited

Floor 25, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400 001

National Stock Exchange of India Ltd.

Exchange Plaza,
Plot no. C/1, G Block,
Bandra-Kurla Complex,
Bandra (E), Mumbai - 400 051

Scrip Code: 502820/DCM

**Sub: Intimation under Regulation 30 of SEBI (LODR) Regulation, 2015
- Outcome of Board Meeting**

Dear Sirs,

Pursuant to Regulation 30 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, as amended from time to time, the Board of Directors in their meeting held on dated December 30, 2020 has:

- 1- Approved the amended policy of 'Code of Practices and Procedures for Fair Disclosure ("the Code") of Unpublished Price Sensitive Information (UPSII)' made under The Securities and Exchange Board of India ("SEBI") notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") on January 15, 2015, pursuant to Regulation 8(1) of the said Regulations. Amended policy is attached herewith;
- 2- Took note of the Order of the Hon'ble High Court of Punjab & Haryana of '**Status Quo**' on notice issued by SBI u/s 13(2) of SARFASI Act. The next date of hearing is fixed on January 27, 2021.

This is for your information and records.

Registered office:

Unit Nos. 2050 to 2052, Plaza - II, Central Square, 20, Manohar Lal Khurana Marg, Bara Hindu Rao, Delhi - 110006.

Phone: (011) 41539170

CIN: L74899DL1889PLC000004, Website: www.dcm.in, Email Id: investors@dcm.in



Thanking you,

Yours faithfully,
For DCM Limited

A handwritten signature in blue ink that reads 'Prasad' with a long horizontal line extending to the right.

Vimal Prasad Gupta
Company Secretary & Compliance Officer
FCS 6380

Attached - As above

Regd. Office:

Unit Nos. 2050 to 2052, 2nd Floor,
Plaza - II, Central Square, 20,
Manohar Lal Khurana Marg,
Bara Hindu Rao, Delhi - 110006.

Ph. 011-41539170.

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Email - investors@dcm.in
dcmltd@dcm.in

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- 4) In the event of any UPSI getting disclosed either selectively, inadvertently or otherwise, the Company will promptly disseminate UPSI to make such information generally available.
- 5) Employees of the Company will not respond under any circumstances to enquiries from the Stock Exchanges, the media or others unless authorized to do so by the CISO or other officials of the Company who are authorized to deal with dissemination of information and disclosure of UPSI.
- 6) The Company will ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities such as Stock Exchanges etc.

(Note: The Company will not comment on every market rumour. If Stock Exchange requests, the Company will submit its response to the stock exchanges regarding such market rumour.)

- 7) The Company will ensure that information shared with analysts and research personnel is not UPSI.
- 8) The Company will handle all UPSI on a need-to-know basis by creating suitable safeguards to avoid UPSI becoming available to any person who is not required to have access to such information. UPSI, may however be disclosed, to persons who need such information for furtherance of legitimate purposes, performance of duties or discharge of legal obligations in relation to the Company. The policy for determination of "legitimate purposes" is as below:

For determining legitimate purposes, the below mentioned policy will be adhered to:

- a) UPSI can be shared only on a need-to-know basis and for legitimate purposes and not to evade or circumvent the prohibitions of the Regulations.
- b) UPSI can be shared in the ordinary course of business only if the same is necessary to be shared in order to complete any task / activity / deal including any other assignment for furtherance of the business interests of the company.
- c) Subject to conditions prescribed in (a) and (b) above, UPSI can be shared with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. in respect of proposed assignment or in order to avail professional services from them or other business purposes, as the case may be. UPSI can also be shared in case same is mandatory for performance of duties or discharge of legal obligations.

Any person in receipt of UPSI pursuant to a legitimate purpose will be considered an "insider" for purposes of the Regulations.

- 9) Trading when in possession of UPSI

When a person who has traded in securities has been in possession of UPSI, his trade(s) would be presumed to have been motivated by the knowledge and awareness of such information in his possession.



- 10) Penalties and Fines applicable in case of violation of the Policy: Any sharing of UPSI, other than in compliance with the Policy and the Regulations, would be construed as a violation. The onus lies on the insider to prove to the contrary. In case of any violation of this Policy, disciplinary action would be taken by the Company. The Company may also inform SEBI as per the requirement of applicable regulations.

- 11) The Code is subject to review by Board of Directors of the Company as and when deemed necessary. The decision of the Board of Directors of the Company with regard to any or all matters relating to the Code will be final and binding on all concerned.

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