



HUBTOWN LIMITED

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

[EFFECTIVE APRIL 1, 2019]

HUBTOWN LIMITED
CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE
OF
UNPUBLISHED PRICE SENSITIVE INFORMATION
TABLE OF CONTENTS

SR. NO.	PARTICULARS	PAGE NO.
I.	Introduction	1
II.	Preamble	1
III.	Objective	1
IV.	Scope	1
V.	Effective Date	1
VI.	Interpretation	2
VII.	Principles of Fair Disclosure	2-3
VIII.	Chief Investor Relations Officer	3
IX.	Disclosure of Unpublished Price Sensitive Information	3-4
X.	Silent Period	4
XI.	Responding to Market Rumours	4
XII.	Disclosure / Dissemination of Unpublished Price Sensitive Information with special reference to Analysts / Institutional Investors	4-6
XIII.	Policy for determination of 'Legitimate Purposes' – Annexure – I	7-8
XIV.	Policy and Procedures for inquiry in case of leak of Unpublished Price Sensitive Information or suspected leak of Unpublished Price Sensitive Information - Annexure - II	9-14

HUBTOWN LIMITED
Code of Practices and Procedures for Fair Disclosure of
Unpublished Price Sensitive Information

[Framed under Regulation 8 (A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

I. INTRODUCTION :

- i. Regulation of Chapter – IV of SEBI (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) prescribes for the formulation of a ‘Code of Practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information’ .
- ii. Regulation 3 (2A) of the PIT Regulations mandates that listed entities shall make a policy for determination of “legitimate purposes” as a part of “Codes of Fair Disclosure and Conduct” formulated under Regulation 8.
- iii. Any subsequent modification and / or amendment to the PIT Regulations by SEBI shall automatically apply to this Code.

II. PREAMBLE :

- i. Pursuant to Clause 8 (1) of Chapter IV of the SEBI (Prohibition of Insider Trading Regulations, 2015 read with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (‘PIT Regulations’), the Board of Directors of Hubtown Limited hereby notifies the “**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**” in adherence to the principles set out in Schedule A to the said PIT (hereinafter referred to as ‘the Code’).
- ii. This Code is to be read in conjunction with the Policy for determination of legitimate purpose is appended to this Code as **Annexure – I**, which will be applicable from April 1, 2019.
- iii. The Policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information is appended to this Code as **Annexure – II**, which will be applicable from April 1, 2019.

III. OBJECTIVE :

This Code intends to provide a standard framework and policy for fair disclosure of events and occurrences which could impact price discovery in the market for the Company’s securities and to maintain uniformity, transparency and fairness in dealings with all stakeholders and ensure compliance with applicable laws and regulations.

IV. SCOPE :

The Company endeavors to preserve the confidentiality of unpublished price sensitive information (UPSI) and to also ensure timely and adequate disclosure of UPSI to the investor community so as to enable them to take informed decisions with regard to the Company’s securities.

V. EFFECTIVE DATE :

This Code shall be applicable with effect from April 1, 2019.

VI. INTERPRETATION :

Words and expressions used but not defined in this Fair Disclosure Code shall have the same meanings assigned to them respectively in the SEBI PIT Regulations or the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be, including amendment(s)/modification(s) thereto.

VII. PRINCIPLES OF FAIR DISCLOSURE :

The Company in compliance with the SEBI PIT Regulations shall adhere to the following principles to ensure timely and fair disclosure of Unpublished Price Sensitive Information :

- i. 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.
- ii. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure once the information is ready to be made generally available. Material events shall be disseminated as mandated by the stock exchanges under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time,
- iii. The Compliance Officer of the Company shall be the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. The Company shall ensure that an appropriate and fair responses and replies to queries on news reports and requests for verification of market rumours from regulatory authorities. The Company as a policy, may choose not to respond to market rumours.
- vi. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information. The Company shall be careful while answering to the queries of the analysts. Unanticipated questions shall be taken on notice and a considered response shall be given later.
7. Developing best practices 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. Handling of all unpublished price sensitive information on a need-to-know basis. All unpublished price sensitive information shall be disclosed on a need-to-know basis and shall not be communicated, provided or allowed access to, except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
9. The Company shall ensure that no insider communicates, provides or allows access to any Unpublished Price Sensitive Information relating to the Company to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

10. All presentations made to financial analysts or investor relation meets will be immediately hosted on the Company's website.
11. Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered as an 'insider' for the purposes of PIT Regulations. And due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with the PIT Regulations.

VIII. CHIEF INVESTOR RELATIONS OFFICER (CIRO) :

- i. The Company Secretary and Compliance Officer of the Company is designated as the Chief Investor Relations Officer (CIRO) who would be responsible to ensure timely, adequate, uniform, universal dissemination of information and disclosure of unpublished price sensitive information pursuant to this Code as required under the PIT Regulations so as to avoid selective disclosure.
- ii. The CIRO shall ensure that then information shared with media, investor, potential investor, analysts and research personnel is not unpublished price sensitive information.
- iii. The CIRO shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of unpublished price sensitive information to stock exchanges, analysts, shareholders and media and educating employees on disclosure policies and procedures.

IX. DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI) :

- i. All disclosure/dissemination of any unpublished price sensitive information required to be made on behalf of the Company under any applicable law, regulations or rules, shall be first marked to the CIRO for approval.
- ii. UPSI handling will be on need to know basis for legitimate purposes only.
- iii. The CIRO shall obtain prior approval of the Managing Director before any such information is made public or published on behalf of the Company.
- iv. On receipt of approval from the Managing Director, any such UPSI shall be first disclosed to the stock exchanges in accordance with the PIT Regulations.
- v. To ensure that the information is disseminated in an uniform manner, the CIRO shall transmit the information to all the stock exchanges at the same time and shall also upload forthwith the same on the website of the Company at : www.hubtown.co.in.
- vi. In case any dissemination of such information takes place without the prior approval of the Managing Director, or by accidental omission, selectively, inadvertently or otherwise, by any employee/Director of the Company, then such employee/Director shall forthwith inform the CIRO and the Managing Director.
- vii. The CIRO will then promptly take appropriate measures as may be directed by the Managing Director to rectify such inadvertent disclosures or omissions including dissemination of the information so as to make such information generally available.

- viii. In case the Company is required to make selective disclosure of UPSI, then such information will be promptly disseminated either in the form of notification to the stock exchanges, public announcement, press release or upload of the information on the website of the Company.

X. SILENT PERIOD :

During the period when the Trading Window is closed before the announcement of the quarterly or annual financial results, any employee of the Company shall not discuss or comment on any aspect of the financial performance of the Company to any member of the media in order to avoid inadvertent disclosure of unpublished price sensitive information on selective basis.

XI. RESPONDING TO MARKET RUMOURS :

- i. The Company's general policy is not to comment upon such rumours and will consistently ignore speculative reports that appear in the press or in the electronic media.
- ii. All queries on news report or requests for verification of market rumours received from the regulatory authorities (s tock exchanges / SEBI) shall be directed to the CIRO who shall decide on the response/clarification in consultation with the Managing Director.
- iii. In order to protect the standing of the Company, the response of the CIRO, in each instance of market rumour will be neither to affirm nor deny the rumour till such time an official position of the subject is developed in consultation with the Managing Director.
- iv. The Managing Director / CIRO shall carry out preliminary enquiry / investigation in the circumstances resulting in origination of the rumour so as to ascertain the exact basis and nature of the rumour, actual/potential effect on movement of prices of the securities and other related factors; and an internal report will be prepared on the basis of the above for deciding the response in the form of clarification, denial or rebuttal to be given to the stock exchanges. If necessary, appropriate press release/public announcement may also be given/made for the information of the general investors.
- v. All requests/queries received shall be documented, and the CIRO shall request for such queries/requests in writing.

XII. DISCLOSURE / DISSEMINATION OF UPSI WITH RREFERENCE TO ANALYSTS / INSTITUTIONAL INVESTORS :

The Company shall follow the guidelines given hereunder while dealing with analysts and institutional investors.

- i. **Only public information to be provided :**
 - a. Only such information that is available in the public domain shall be made available to the analysts / potential investors. Discussion on any topic or issue or any data, which cannot be made public, shall be avoided. Alternatively, the information given to the analysts / institutions should be simultaneously made public at the earliest.

- b. The CIRO shall be invited to all meetings / conferences organized by the Company with analysts / potential investors. No Company official will interact with the analysts, financial market participants or any media representatives unless the CIRO is also present during such interaction.
- c. Inquiries received from analysts, financial market participants, investors or any media representatives in any department must be forwarded to the CIRO. Under no circumstances should any attempt be made to handle these inquiries without the prior authorization from the CIRO / Managing Director.
- d. In case some unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise, the same shall be brought to the notice of the CIRO to enable him to make such information public at the earliest, in consultation with the Managing Director.

ii. Handling of unanticipated questions :

- a. Extreme care and caution shall be exercised when issues are raised by the analysts / institutions that are outside the intended scope of discussion.
- b. All unanticipated queries / questions raised by analysts shall be taken on record by the CIRO and a considered response may be given later in consultation with the Managing Director. In case, if the response includes dissemination of unpublished price sensitive information, the CIRO shall report the same to the Managing Director and obtain necessary approval for its dissemination to the stock exchanges /public announcement through press.
- c. The CIRO, after dissemination of such unpublished price sensitive information aforesaid, will respond to such unanticipated questions.

iii. Recording of discussion :

- a. In order to avoid misquoting or misrepresentation, atleast two representatives of the Company including CIRO shall be present at the meetings with analysts, brokers or institutional and potential investors and the discussions should preferably be recorded.
- b. Transcript of meetings with analysts, brokers, institutional and potential investors shall be communicated to the stock exchanges and then hosted on the website of the Company at www.hubtown.co.in.

iv. Simultaneous release of information :

- i. Whenever the Chairman / Managing Director proposes to organize meetings with analysts, institutional and potential investors, the Company shall make a press release or post relevant information on its website after every such meetings.
- ii. A press release would be sent prior to the meetings to the stock exchanges and hoisted on the Company's website.
- iii. The CIRO shall be responsible for vetting of the text of the information to be hosted on the Company's website with the approval of the Chairman / Managing Director.

- iv. Transcripts, Earnings guidance, Investors' presentation, or any other similar material distributed during such meetings shall also be hosted on the Company's website.

This Policy was approved and adopted by the Board of Directors of the Company in its meeting held on February 13, 2019]

POLICY FOR DETERMINATION OF 'LEGITIMATE PURPOSES'

[Under Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

I. INTRODUCTION :

- i. This Policy has been framed in compliance with the provisions of Regulation 3 (2A) of the PIT Regulations.
- ii. This Policy will be applicable to all "Insider".
- iv. This Policy shall come into force with effect from April 1, 2019.
- v. Any subsequent modification and / or amendment to the PIT Regulations by SEBI shall automatically apply to this Code.
- vi. Words and expressions used and not defined in this Policy or in the Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information shall have the same meanings assigned to them respectively in the SEBI PIT Regulations or the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be, including amendment(s)/modification(s) thereto.

II. OBJECTIVE :

The objective of this Policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as an exception for the purpose of procuring unpublished price sensitive information (UPSI) relating to the Company or its listed securities or securities proposed to be listed, if any.

III. DEFINITIONS :**I. "LEGITIMATE PURPOSE" :**

'Legitimate Purposes' shall mean sharing of Unpublished Price Sensitive Information in the course of business by an insider with promoters of the Company'; partners, collaborators; lenders; customers; suppliers; bankers; merchant bankers; legal advisors; auditors; insolvency professionals; other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations.

II. INSIDER :

- i. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered as an 'Insider' for the purposes of these Regulations.
- ii. Due notice shall be given to such 'Insider' so as to make him/her/it aware that the information shares is 'UPSI' and that he/she/it is required to maintain confidentiality of such UPSI in compliance with the PIT Regulations.

IV. MAINTENANCE OF DIGITAL DATA BASE :

- i. The CIRO shall be responsible to maintain a structured digital data base of such persons or entities with whom such UPSI is shared, containing the following information :
 - a. Full name of the recipient of UPSI;
 - b. Name of the entity whom the recipient represents
 - c. Complete residential / registered office address of the recipient
 - d. Permanent Account Number or other identifier authorized by law in case permanent Account Number is not available.
- ii. The CIRO shall be responsible to ensure that such data base is maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the data base.

V. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS :

The Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, and shall not otherwise trade in securities of the Company when in possession of UPSI.

VI. AMENDMENT :

In case there are any regulatory changes requiring modification to this policy, the same shall be reviewed and amended with the approval of the Board of Directors. However, the amendment in the regulatory requirements shall be binding on the Company and shall prevail even if the same is not incorporated in this Policy.

[Policy for determination of 'Legitimate Purposes' Clause (VI) of this Code formulated pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 shall come into effect from April 1, 2019]

[This Policy was approved and adopted by the Board of Directors of the Company in its meeting held on February 13, 2019]

POLICY AND PROCEDURES FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION OR SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

I. INTRODUCTION :

Regulation 9A (5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended has mandated every listed company to frame a written policy and procedures for inquiry in case of leak of unpublished price sensitive information and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In this regard, the Board of Directors of Hubtown Limited has framed this Policy for procedure of inquiry in case of leak of Unpublished Price Sensitive Information (the Policy) for adoption.

II. OBJECTIVES OF THE POLICY :

- i. To strengthen the internal control system to prevent leak of UPSI;
- ii. To restrict and prohibit the practice of sharing of UPSI with unauthorized person, which originates from within the Company and which affects the market price of the securities of the Company as well as loss of reputation and investors' / financiers' confidence in the Company;
- iii. To have a uniform code to curb the unethical practice of sharing UPSI by insiders, employees and designated persons with any person, firm, company or body corporate;
- iv. To initiate inquiry in case of leak of UPSI or suspected leak of UPSI and inform the Securities and Exchange Board of India promptly; and
- v. To take disciplinary actions, if deemed fit, against any insider, employee and designated person who appear to be guilty of violating this Policy.

III. SCOPE OF THE POLICY :

The Company endeavors to preserve the confidentiality of unpublished price sensitive information (UPSI) and to prevent misuse of such information. This Policy lays down procedures for inquiry in case of leak of UPSI or suspected leak of UPSI and to inform SEBI of such leaks, inquiries and results of such inquiries promptly.

IV. APPLICABILITY :

This Policy shall be applicable to all designated person and immediate relatives of designated persons and persons in possession of or having access to unpublished price sensitive information. This Policy shall come into force with effect from April 1, 2019.

V. DEFINITIONS

- i. **Chief Investor Relations Officer** : shall mean the Compliance Officer of the Company appointed by the Board of Directors under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- ii. **Leak of UPSI** : shall refer to such act / circumstance(s) by virtue of which an UPSI is made available or becomes available, by any means or mode to any person, association, body corporate, agency, society, entity or a group thereof, whether registered or otherwise before its official publication or announcement or formal circulation in public domain and which shall also include any purported attempt thereof.
- iii. **Unpublished Price Sensitive Information** : shall mean any information relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily include but not restricted to, information relating to the following :
 - i. Periodical Financial results of the Company;
 - ii. Intended declaration of dividend (interim and final);
 - iii. Change in capital structure :i.e. issue of securities, buy-back of shares or an forfeiture of shares or change in market lot of shares, bonus issue, etc;
 - iv. Merger, demerger, amalgamation, acquisition, divestment, delisting of securities, scheme of arrangement, or takeover, spin off, hiving off, or selling division of whole or substantially whole of the undertaking and expansion of business and such other transactions;
 - v. Any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company;
 - vi. Changes in Key Managerial Personnel;
 - vii. Material events in accordance with SEBI LODR; and
 - viii. Any other matter as may be prescribed under the Listing Regulations and/or corporate law considered to be price sensitive, from time to time.

VI. DUTIES OF CHIEF INVESTOR RELATIONS OFFICER :

The following shall be duties of the Chief Investor Relations Officer :

- i. Oversee and monitor the compliance of this Policy;
- ii. Report the actual or suspected leak of UPSI to the Securities and Exchange Board of India;
- iii. Inform the Stock exchanges of the actual or suspected leak of UPSI;
- iv. To co-ordinate with and disclose the relevant facts of the incidence of actual or suspected leak of UPSI to the Enquiry Committee.

VII. DISCLOSURE OF ACTUAL OR SUSPECTED LEAK OF UPSI TO STOCK EXCHANGES :

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the CIRO shall ensure that the same shall be promptly intimated to the Stock Exchanges where the Company's securities are listed in the format as set out in **Annexure – A** to this Policy.

VIII. REPORT OF ACTUAL OR SUSPECTED LEAK OF UPSI TO SEBI :

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the CISO shall ensure that a report on the actual or suspected leak of UPSI, preliminary enquiry thereon and the results thereof shall be promptly made to the Securities and Exchange Board of India in the format as set out in **Annexure – B** to this Policy.

IX. CONSTITUTION OF ENQUIRY COMMITTEE :

The Board of Directors shall constitute a committee to be known as 'Enquiry Committee'. The Enquiry Committee shall consist of minimum 3 (three) members which shall include the Executive Chairman, the Managing Director Chief Financial Officer, Chief Investor Relations Officer and any other officer of the Company as may be mutually decided by the member of the Committee.

The Managing Director is empowered to change/alter/re-constitute the Enquiry Committee as may be required from time to time.

X. TERMS OF REFERENCE OF THE ENQUIRY COMMITTEE :

The Enquiry Committee shall be responsible for :

- i. Conducting a preliminary enquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI;
- ii. Authorising any person, if required, to collect necessary support material;
- iii. Considering the facts and circumstances of the case and decide or give directions in the matter; and
- iv. Deciding disciplinary action thereon.

XI. PROCEDURE FOR ENQUIRY IN CASE OF LEAK OF UPSI :

i. To take cognizance of the matter :

- a. Enquiry under this Policy shall commence based on a written complaint / information received from any employee, Ministry of Company Affairs, Registrar of Companies, designated person, Depositories, Stock Exchanges or any regulatory authority or any other department of Central or State Government.
- b. The Enquiry Committee shall meet within five working days after receipt of the information / complaint of actual or suspected leak of UPSI and take cognizance of the matter and decide as follows :
 - aa. If the information is found to be untrue, baseless or frivolous, the same may be dismissed;
 - bb. If it is found that the matter requires further investigation, preliminary enquiry may be initiated.

ii. Preliminary Enquiry :

Preliminary enquiry is a fact finding exercise to be conducted by the Chief Investor Relations Officer. The object of the preliminary enquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to take disciplinary action.

The Enquiry Committee shall appoint and/or authorize any person(s), as it may deem fit, to initiate/ conduct an enquiry to collect the relevant facts and material substances on actual or suspected leak of USPI.

iii. Submission of Report of Preliminary Enquiry :

The Chief Investor Relation Officer or the person(s) appointed /authorized to enquire the matter of actual or suspected leak of USPI shall submit his/her report to the Enquiry Committee within 7 (seven) days from the date of his/her appointment in this behalf.

iv. Disciplinary Action :

The disciplinary action(s) shall include wage freeze, suspension, recovery, claw back, etc. as may be decided by the Committee members.

XII. Notwithstanding anything contained hereinabove, the Company suo moto reserves the right of initiating an enquiry under this Policy against any designated person, if it has reasons to believe that such person has leaked USPI or suspected to having leaked USPI.

XIII. AMENDMENT :

In case there are any regulatory changes requiring modification to this policy, the same shall be reviewed and amended with the approval of the Board of Directors. However, the amendment in the regulatory requirements shall be binding on the Company and shall prevail even if the same is not incorporated in this Policy.

[This Policy was approved and adopted by the Board of Directors of the Company in its meeting held on February 13, 2019]

Format for Intimation of Actual or Suspected Leak of Unpublished Price Sensitive Information to the Stock Exchanges

[Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015]

To,

The Corporate Relationship Department BSE Limited P. J. Towers, Dalal Street Fort, Mumbai 400001 Scrip Code: 532799	The Listing Department The National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex Bandra (East), Mumbai 400051 Symbol: HUBTOWN
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Dear Sir / Madam,

Sub : **Intimation of actual or suspected leak of Unpublished Price Sensitive Information pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we report actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company as follows :

Name of the Offender (if known)	
Name of the Organisation	
Designation (Employer, Insider, Designated Person or any other)	
Nature of Information	
Whether any action has been initiated by the Company	Yes / No
If yes, narration of the same	
Any other information	

We request you to kind take the above information on your record.

Thanking you,

Yours faithfully,

For **Hubtown Limited**

Company Secretary

Format for Intimation of Actual or Suspected Leak of Unpublished Price Sensitive Information to the Stock Exchanges

[Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure requirements) Regulations, 2015]

To,

**Securities and Exchange Board of India
Plot No. C4-A G Block
Bandra Kurla Complex
Bandra (East), Mumbai 400051**

Dear Sir / Madam,

Sub : **Intimation of actual or suspected leak of Unpublished Price Sensitive Information pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we report actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company as follows :

Name of the Offender (if known)	
Name of the Organisation	
Designation (Employer, Insider, Designated Person or any other)	
Nature of Information	
Whether any action has been initiated by the Company If yes, narration of the same	Yes / No
Any other information	

We request you to kind take the above information on your record.

Thanking you,

Yours faithfully,

For **Hubtown Limited**

Company Secretary