

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Oriental Bank of Commerce Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Pursuant to regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, a code of practices and procedures for fair disclosure of unpublished price sensitive information has been framed by the Bank and detailed hereunder so as to ensure timely and adequate disclosure of price sensitive information with respect to the Bank.

1. The Bank shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Bank shall make uniform and universal dissemination of unpublished price sensitive information through prompt intimation to Stock Exchanges to avoid selective disclosure.
3. The Bank shall designate the General Manager (MBD) as the **Chief Investor Relations officer** to take all required action for dissemination of information and disclosure of unpublished price sensitive information.
4. The Bank shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Bank shall give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Bank shall ensure that the information, if any, shared with analysts and research personnel is not unpublished price sensitive information.

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Bank representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

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7. The Bank shall develop 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. The policies framed by the Bank shall be disclosed on its website in terms of the requirements of the applicable laws.
9. Unpublished price sensitive information shall be handled on a need-to-know basis i.e. unpublished price sensitive information shall be disclosed only to those who need the information to discharge their duty.

Disclosure: The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and every amendment thereto shall be promptly intimated to the stock exchanges and also published on the Bank's website.