

## **Code of Practices and Procedures for Fair Disclosures of Un-published Price Sensitive Information**

### **A) The Code**

Dr. Reddy's Laboratories Limited (below referred to as "the Company") has adopted this Code in compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

### **B) Definitions for the purpose of the Code**

"Unpublished Price Sensitive Information" (UPSI) shall mean any information relating to a Company or its Securities, directly or indirectly, that is not generally available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 including but not restricted to, information relating to the following:

- (i) financial results;
- (ii) dividends;
- (iii) changes in capital structure;
- (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel; and
- (vi) material events in accordance with the listing agreement in relation to the Company.

"Chief Investor Relations officer" for the purpose of this Code, head of Investor Relations shall be designated as Chief Investor Relations officer.

### **C) Uniform and universal disclosure of UPSI**

The Company shall promptly furnish to the Stock Exchanges where the securities of the Company are listed, the material information related to any UPSI as soon as credible and concrete information comes into being.

The information may also be hosted on the Company's website and will simultaneously be released to the media and news wires for wider circulation to make it generally available.

The Chief Investor Relations Officer shall ensure that such dissemination of the UPSI is uniform and universal to avoid selective disclosures. In case any UPSI gets disclosed selectively, inadvertently or otherwise, the Chief Investor Relations officer shall ensure that such information is made generally available immediately. In this context, rumours or media speculation shall not be considered as selective disclosure.

### **D) Response to Regulatory Authorities**

The Company shall appropriately and fairly respond to regulatory authorities, upon queries on UPSI, news reports and requests for verification of market rumours by such regulatory authorities.

### **E) Interactions with Analysts, Investors and Research Personnel**

The Company in order to have better investor relations, may interact with investors, investing community, equity research analysts and other members of the investing community from time to time. However, during these interactions the Company shall ensure that no UPSI is disclosed selectively to any one or group of research analysts or investors, to the disadvantage of other stakeholders.

To ensure official documentation of disclosures, the transcripts or recordings of the proceedings of any investor conference organised by the Company, may be made available on the Company's website, along with the documents / presentation, if any, made at such conference.

**F) Handling of all UPSI**

The Company shall ensure that UPSI is handled on a "need to know" basis, i.e., price sensitive information should only be disclosed to those within the Company who need the information for legitimate purposes, performance of his/ her duties or discharge of his / her legal obligations.

The Company may make suitable arrangements to classify the computer files according to their sensitivity and such files shall be appropriately encrypted and handled.