



ORIENT REFRACTORIES LIMITED

CODE OF CORPORATE DISCLOSURE

PRACTICES FOR PREVENTION OF INSIDER TRADING

Corporate Disclosure Policy

To ensure timely and adequate disclosure of price sensitive information, the following norms shall be followed by the Company:-

1. Prompt disclosure of price sensitive information
 - a) Price sensitive information shall be given to the stock exchanges and disseminated on a continuous and immediate basis.
 - b) For improving Investor access to Company's public announcements, the Company shall endeavor to consider ways of supplementing information released to stock exchanges.
2. Overseeing and co-ordinating disclosure
 - a) The Company designates Managing Director (hereinafter designated officer) to determine the materiality of any event or transaction or information and oversee corporate disclosures.
 - b) Managing Director and Company Secretary shall be responsible for ensuring that the company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure.
 - c) Information disclosure/dissemination shall normally be approved 1 day in advance by the Company Secretary for the purpose.
 - d) If information is accidentally disclosed without prior approval, the person responsible shall inform the designated officer immediately, even if the information is not considered price sensitive.
3. Responding to market rumours
 - a) The official designated for corporate disclosure shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.
4. Timely Reporting of shareholdings/ownership and changes in ownership

The Company shall make timely and adequate disclosure of shareholdings/ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Act and the listing agreement.
5. Disclosure/dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors
 - a) Company will follow guidelines given hereunder while dealing with analysts and institutional investors:-
 - (i) Only Public information to be provided – The Company shall provide only public information to the analyst/research persons/large investors like institutions.
Alternatively, the information given to the analyst should be simultaneously made public at the earliest.
 - (ii) Recording of discussion - In order to avoid misquoting or misrepresentation, it is desirable that at least two company representative be present at meetings with Analysts, brokers or Institutional Investors and discussion should preferably be recorded.
 - (iii) Handling of unanticipated questions – The Company should be careful when dealing with



ORIENT REFRACTORIES LIMITED

analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions should be taken on notice and a considered response should be given later. If the answer includes price sensitive information, a public announcement should be made before responding.

(iv) Simultaneous release of Information - When the company organises meetings with analysts, the company shall make a press release or post relevant information on its website after every such meet. The company may also consider live webcasting of analyst meets.

6. Medium of disclosure/dissemination

- a) Disclosure/dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.
- b) Company shall ensure that disclosure to stock exchanges is made promptly.
- c) Company will also facilitate disclosure through the use of its dedicated Internet website.
- d) Company websites shall provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers.
- e) The information filed by the Company with exchanges under continuous disclosure requirement may be made available on the company website.