



3M India Limited
5th Floor Marksquare,
61, St Marks Road,
Bengaluru 560001, India
Tel: +91 80 22231414
www.3M.com/in

June 9, 2025

Corporate Relationship Department
BSE Limited
1st Floor, New Trading Ring, Rotunda Building
P.J. Towers, Dalal Street, Fort
Mumbai - 400 001

Scrip Code - 523395

The Secretary
National Stock Exchange of India Limited
Exchange Plaza, Bandra – Kurla Complex
Bandra (E), Mumbai – 400 051

Scrip Code – 3MINDIA

Dear Sirs,

Sub: Amendment to the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

This is to inform you that in compliance with Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has amended the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, inter alia, incorporating the recent amendments to SEBI (Prohibition of Insider Trading) Regulations, 2015.

A copy of the Code of Fair Disclosure is enclosed, which will also be available on the Company at: https://www.3mindia.in/3M/en_IN/company-in/about-3m/financial-facts-local/

Thanking you

Yours faithfully

For 3M India Limited

Pratap Rudra Bhuvanagiri
Company Secretary &
Compliance Officer



*3M India Limited
Plot No. 48 – 51,
Electronics City, Hosur Road
Bangalore – 561 100*

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED
PRICE SENSITIVE INFORMATION PURSUANT TO REGULATION 8 OF THE SECURITIES
AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING)
REGULATIONS, 2015 AS AMENDED**

Corporate Disclosure Policy:

As a part of the Corporate Governance policy, the Company is committed to protecting the interests of the investors by quick and timely dissemination of financial results and other information as well as by regulating trading in securities of the Company by Officers, Directors, connected persons etc., The Company believes in timely and adequate disclosure of price sensitive information only on a need to know basis and for legitimate purposes.

“Unpublished Price Sensitive Information (UPSI)” means any information, relating to the Company or its securities, directly or indirectly, that is not generally available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 but excludes information relating events in accordance with the listing agreement:

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of award or termination of order/contracts not in the normal course of business and such other transactions(v) changes in key managerial personnel (KMP); other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor
- (vi) change in rating(s), other than ESG rating(s);
- (vii) fund raising proposed to be undertaken;
- (viii) agreements, by whatever name called, which may impact the management or control of the company;
- (ix) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
- (X) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- (xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- (xii) initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- (xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
- (xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- (xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- (xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

The Company Secretary is the Compliance Officer to administer the code of conduct and other requirements and the Managing Director is designated as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

The Managing Director is responsible for Investor Relations shall oversee and carry out disclosure of price sensitive information to Stock Exchanges, Analysts, Shareholders and media. He /She shall be responsible for ensuring that the Company complies with continues disclosure requirements.

Disclosure of UPSI

The Compliance Officer in consultation with the Managing Director shall furnish UPSI to the stock exchanges. The UPSI shall be hosted in the website of the Company after the information is furnished to the Stock Exchanges. Disclosure / dissemination of information may be approved in advance by the Managing Director or the Compliance Officer as the case may be. If information is accidentally disclosed without prior approval, the person making such disclosure shall immediately inform the Managing Director, even if the information is not considered price sensitive. The Compliance Officer in consultation with the Managing Director shall respond to queries or requests from Stock Exchanges concerning market rumors. The Compliance Officer along with the Managing Director shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumors and then making the disclosure.

Sharing of UPSI for Legitimate Purpose

Directors and employees shall maintain strict confidentiality of business information and all UPSI of the Company.

“Insider” means any person who,

- (i) a connected person; or
- (ii) is in possession of or having access to unpublished price sensitive information.
- (iii) any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

The UPSI should not be communicated to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligation and in ordinary course of business.

“Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) (AMENDMENT) REGULATIONS, 2018.

Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations and not to trade in securities of the Company when in possession of UPSI and for the said purpose the Company shall execute agreement with such insider(s).

The Insider sharing the UPSI to others in furtherance of legitimate purposes, performance of duties or discharge of legal obligation and in ordinary course of business shall enter the following information on the digital database maintained by the Company pursuant to provisions of Regulation 3(5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended:

1. Name of the Person sharing the information along with employee number.
2. Brief description of the nature of information shared.
3. Purpose of sharing the information.
4. Name, designation and organization of the Person to whom the information is shared.
5. PAN or any other identifier authorized by law of the Person to whom the information is shared.
6. Date and time of sharing the information.

Only public information shall be provided to the analyst / research persons / large investors like institutions. Alternatively, the information so given should be simultaneously made public at the earliest.

In order to avoid misquoting or misrepresentation, the Compliance Officer and one other representative of the Company shall be present at meetings with Analysts, brokers or Institutional Investors and discussion shall be recorded.

‘Analysts’ questions that raise issues outside the intended scope of discussion should be handled with care. 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.

When any meeting is organized with analysts, a press release shall be made, or relevant information hosted on website after every such meet. The Company may consider live web casting of analyst meets.

Disclosure / dissemination of information may be made through various media so as to achieve good reach and quick dissemination. Disclosure to stock Exchange shall be made promptly. Disclosures may also be made through the use of dedicated Internet website. Company website may be used to give investors a direct access to analyst briefing material, significant background information, questions and answers.

Medium of Disclosure/Dissemination

Disclosure / dissemination of information may be made through various media so as to achieve good reach and quick dissemination. Disclosure to stock Exchange shall be made promptly. Disclosures may also be made through the use of dedicated Internet website. Company website may be used to give investors a direct access to analyst briefing material, significant background information, questions and answers. Information filed with Stock Exchanges under continuous disclosure requirement may be made available on the Company’s website.
