

May 18, 2015

Date :

To,

The Deputy General Manager,  
Corporate Relationship Department,  
Bombay Stock Exchange Ltd.,  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building, P.J.Towers,  
Dalal Street, Fort,  
Mumbai – 400 001

Dear Sir,

**Sub: Confirmation regarding code of internal procedures and conduct for regulating, monitoring and reporting of trading by insiders**

**Ref: SEBI circular no. CIR/ISD/01/2015 dated 11/05/2015**

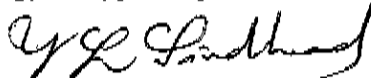
In accordance with SEBI circular on SEBI (Prohibition of Insider Trading) Regulations, 2015, we wish to inform you that the Board of Directors of the Company have formulated the "Code of Conduct and Fair Disclosure Procedure for regulating, monitoring, report trading by insider" and "Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information (UPSI)" pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

We also wish to inform you that the "Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information (UPSI)" pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 have been published on the official website of the Company.

This is for your information and records.

Thank you.

For Universal Starch Chem Allied Limited



Y.L. Sindhwad  
Company Secretary

# UNIVERSAL STARCH-CHEM ALLIED LTD.



Mhatre Pen Building, 'B' Wing, 2nd Floor, Senapati Bapat Marg, Dadar (West), Mumbai - 400 028.  
Tel.: 6656 3333, 2436 2210 • Fax:022-2430 5869 • Gram:GROWMAIZE • E-mail:mumbai@universalstarch.com  
CIN : L24110MH1973PLC016247

Date :

## CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION Pursuant to Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

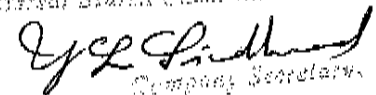
The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of insider Trading Regulations, 2015 ("Regulations")) under the powers conferred on it under the SEBI Act, 1992. These regulations shall come into force with effect from 15<sup>th</sup> May, 2015 and the same have been made applicable to all companies whose shares are listed on Indian Stock Exchnages. The Company is required to formulate Code of Practises and Procedures for Fair Disclosures of Unpublished Price Sensitive Information.

Objective of the Code of Fair Disclosures is required for the Company to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information.

In terms of Regulation 8 of the Regulations, the Board of Directors of the Company has formulated this Code of practices and procedures for fair disclosure of unpublished price sensitive information to be followed:

1. The Company 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 Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

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*Universal Starch Chem Allied Ltd.*  
  
Company Secretary

Contd on Page No. 2

Factory : Rawal Industrial Estate, Dada Nagar, Dondaicha-426 408. Dist : Dhule (Maharashtra)  
Phone : 02566-244151, 244152, 244153 • Fax : 02566-244225 • E-Mail : dondaicha@universalstarch.com

3. The Compliance Officer of the Company is designated as Chief Investor Relation Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. In case any unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise, the Company shall make prompt dissemination of such information to make it generally available.
5. The Company shall give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company will make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all unpublished price sensitive information on a need-to-know basis.
9. The Board of Directors may review and amend this Code from time to time.

For Universal Starch Chem Allied Ltd.  
  
Company Secretary.