



ATUL LTD

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SEC: A:1

March 27, 2015

The Company Secretary
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai 400 001

bse.listing@bseindia.com

corp.relations@bseindia.com

The Manager
Listing Department
National Stock Exchange of India Limited
"Exchange Plaza" C-1, Block G
Bandra-Kurla Complex
Bandra (East)
Mumbai 400051

cmllist@nse.co.in

Dear Sir:

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we are enclosing "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

We request you to inform the members of the Exchange accordingly.

Thank you,

Yours faithfully,
FOR ATUL LTD

Lalit Patni
Company Secretary and
Chief Compliance Officer



LALBHAI GROUP

Registered Office: Atul House, G I Patel Marg, Ahmedabad 380014, Gujarat, India

ATUL LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

- a) The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b) The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- c) The Company Secretary shall act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished Price Sensitive Information.
- d) The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e) The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f) The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
- g) The Company will develop best practices to make available transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- h) The Company will handle all unpublished price sensitive information on a need-to-know basis.

The Code has been adopted by the Board of Directors in its meeting held on March 27, 2015 and shall be effective from May 15, 2015.

