

TIRUPATI

INDUSTRIES (INDIA) LIMITED
ACHIEVE



Date: 20th May, 2015.

Ref: TIRUPATI/BSE/18/42/2015-16

THE MANAGER
(MANAGER – DEPT. OF CORPORATE SERVICES)
THE BOMBAY STOCK EXCHANGE
GROUND FLOOR, FORT,
MUMBAI - 400 001.

Dear Sir,

Sub: Adoption of Code of Fair Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015 (the said Regulations)


In Compliance with the above requirements we hereby inform you as follows:

1. Pursuant to the requirements of Regulation 8(2) of the Regulations, the Company has formulated and published on its website www.tirupatiind.com the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information, a copy of which is enclosed herewith for your record.
2. Pursuant to the requirements of Regulation 9(1) of the Regulations, the Company has formulated a Code of Internal Procedures and Code of Conduct for Prevention of Insider Trading.

This is for your information and records.

Thanking you,

Yours truly,
For Tirupati Industries (India) Limited


Milee Shah
Company Secretary



Enc: Code of Fair Disclosure

TIRUPATI

INDUSTRIES (INDIA) LIMITED

ACHIEVE



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE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

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering to each of the principles is set out below:

1. The Company shall endeavor to make prompt public disclosure of unpublished price sensitive information that may impact price discovery, no sooner than credible and concrete information comes into being in order to make such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 The Company shall endeavor to make Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company shall designate a senior officer as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall endeavor to make Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall make 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 shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall endeavor to put in place a system to ensure handling of all unpublished price sensitive information on a need- to-know basis.

