



(Formerly Shree Ganesh Jewellery House Ltd.)
CIN : L36911WB2002PLC095086
Vardaan Market, 4th Floor, Suite # 413, 25A, Camac Street,
Kolkata - 700 016, India. | Phone : +91 33 3028 9188
E-mail : info@sgjhl.com | Website : www.sgjhl.com

15th May, 2015

BSE Limited

Phiroze Jeejeebhoy Towers

Dalal Street

Mumbai - 400 001

Ref: Scrip code – 533180

Sub: Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

Pursuant to SEBI Circular No. CIR/ISD/01/2015 dated 11th May, 2015, we hereby confirm that the Company has formulated and adopted a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, as required under Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, at its Board Meeting held on 11th May, 2015. The aforesaid Code, copy of which is enclosed for your records, is also uploaded on the Website of the Company.

Further, the Company has also formulated and adopted Code of Conduct to regulate, monitor and report trading by Insiders as required under Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The aforesaid Codes shall be effective from 15th May, 2015.

The above is for your information and record.

Thanking you.

Yours faithfully,

For Shree Ganesh Jewellery House (I) Limited

Neha Jhunjunwala
Company Secretary



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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This Code frames the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” in terms of Regulation 8 (1) of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The code shall come into force with effect from 15th May, 2015.

The Company will adhere to the following principles to ensure timely and fair disclosure of unpublished price sensitive information.

- (a) The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- (b) The Company will endeavour to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- (c) The Chief Financial Officer (CFO) of the Company will act as a 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 rumors by regulatory authorities.
- (f) The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- (g) The Company will 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.
- (h) Unpublished price sensitive information shall be handled on a “need-to-know” basis.

