

ADITYA BIRLA



MONEY

Ref: SECTL/2015 – 0018

14th May, 2015

Bombay Stock Exchange Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI – 400 001

Fax # 022-22723121/ 22722037
22722041/ 22723719
22722039/ 22722061

National Stock Exchange of India Limited,
Exchange Plaza, 5th Floor,
Plot No. C/1, G-Block,
Bandra-Kurla Complex, Bandra (East)
MUMBAI – 400 051

Fax # 022-26598237/38

Dear Sirs,

Sub: Code pursuant to Regulation 8 & 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Scrip Code: BSE – 532974; NSE – BIRLA MONEY

Please find attached the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information adopted by the Board of Directors at their meeting dated May 04, 2015 pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Further, we wish to confirm that the Company has formulated a Code of Conduct under Regulation 9 of the said Regulations, as adopted by the Board of Directors at their meeting dated May 04, 2015.

This is for your information and record.

Thanking you,

Yours faithfully,

For Aditya Birla Money Limited,


Vikashh K Agarwal
Company Secretary

Encl.: as above.



CODE OF PRACTICE AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

As approved by the Board of Directors of the Company at its Meeting held on May 04, 2015

This Code is formulated on the principles, as set out in Schedule A to the SEBI (Prohibition of Insider Trading) Regulation, 2015.

Definitions

1. **"Compliance Officer"** means any senior officer, designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI (Prohibition of Insider Trading) Regulation, 2015 and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specified in the SEBI (Prohibition of Insider Trading) Regulation, 2015, under the overall supervision of the Board of Directors of the Company.
2. **"Unpublished price sensitive information" ("UPSI")** means any information, relating to a company or its securities, directly or indirectly, that is not generally available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:
 - i. financial results;
 - ii. dividends;
 - iii. change in capital structure;
 - iv. mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - v. change in key managerial personnel; and
 - vi. material events in accordance with the listing agreement

The Company in the Board Meeting held on May 04, 2015 has appointed the Company Secretary (*Compliance Officer*) as the Chief Investor Relations officer, who shall report to the Board of Directors, for the purpose of this Code.

The Compliance Officer shall ensure the following:

1. 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. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure;
3. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities;
5. The information shared with analysts and research personnel is not Unpublished Price Sensitive Information;
6. 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.
7. Handling of all Unpublished Price Sensitive Information on a need-to-know basis