

17-B, Mahal Industrial Estate,  
Mahakali Caves Road,  
Andheri (E), Mumbai - 400 093. INDIA.  
Tel. : (91-22) 6645 5645  
Fax : (91-22) 6645 5685

CIN : L73100GJ2006PLC047837  
Website: [www.sunpharma.in](http://www.sunpharma.in)

**SUN PHARMA  
ADVANCED RESEARCH  
COMPANY LTD.**



**May 15, 2015**

National Stock Exchange of India Ltd,  
Exchange Plaza, 5th Floor,  
Plot No. C/1, G Block,  
Bandra Kurla Complex,  
Bandra (East),  
Mumbai – 400 051.  
Tel: 022 26598235/36  
Fax: 022 26598237/38

BSE Limited.,  
Market Operations Dept.  
P. J. Towers,  
Dalal Street,  
Mumbai - 400 001.

Tel: 022 22721234/1233 Extn: 8031  
Fax: 022 22723121

Dear Sirs,

**Sub : Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**Ref: Scrip Code : BSE – 532872, NSE – SPARC**

**Sub:**

In compliance with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations") we hereby inform you as follows:

1. Pursuant to the requirements of regulation 8(2) of the Regulations, the Company have formulated & published on its website [www.sunpharma.in](http://www.sunpharma.in) the "*Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information*", a copy of which is enclosed herewith for your record.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.

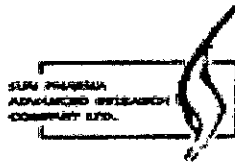
This is for your information and records.

Thanking you,

Yours faithfully,  
For Sun Pharma Advanced Research Company Ltd

  
**Debashis Dey**  
Company Secretary

Encls: A/a.



## **SUN PHARMA ADVANCED RESEARCH COMPANY 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### **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE.**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.)**

1. The Company shall endeavor to make prompt public disclosure of all unpublished price sensitive information(s) that may impact price discovery, as soon as credible and concrete information comes into being, in order to make such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 The Company shall endeavor to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.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 to act as the 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. No communication shall be made by the Company to any analyst or investor of any Unpublished Price Sensitive Information or a part thereof at any such meetings with analysts or investor conferences. All information communicated at such meetings will be only such information that is available in public domain or otherwise disclosed on the website of the company or in transcripts or recordings of quarterly results call disclosed on the website of the company.
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.