

(Formerly Known As Nova Petrochemicals Limite

Regd. Office & Factory:

396 & 403, Moraiya Village, Sarkhej-Bavla Highw Sanand, Ahmedabad-382 210. Gujarat (India)

Phone: +91-2717-250550 (3 Lines)

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15th June, 2015.

The Manager - Listing Department. Bombay Stock Exchange Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001.

Sub.: Submission of Code of Practice and Procedures for Fair disclosure of Unpublished Price Sensitive Information

Ref.: 530605(BSE)

Dear Sir,

Pursuant to the Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find herewith attached a copy of Practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) of Company which has been approved and adopted by the Board.

Kindly take above information(s)/ document (s) on your record and oblige.

Thanking You

Yours Faithfully

For, GSL Nova Petrochemicals Limited

Dhwani Shah

Company Secretary Cum Compliance officer

(ACS No. 31424)

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Code of practices and procedures for Fair and disclosure of Unpublished price sensitive Information(UPSI)

Regulation 8 of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 requires a listed Company to formulate and procedures for fair disclosure of unpublished price sensitive information which shall adhere to each of the principles as set out in Schedule A to the said Regulations.

Accordingly, a code is hereby framed as under:

- 1. The Company shall ensure prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery, as soon as it has credible and concrete information, in order to make such information generally available i.e. to make the information accessible to the public on a non discriminatory basis.
- 2. The company shall ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
- 3. The Compliance officer of the company shall act as the Chief Investors Relations Officer (CIRO) to deal with dissemination of information and disclosure of UPSI.
- 4. The company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'
- 5. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- 6. The Company shall develop best practices to make transcripts or record of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosure made, if any.
- 7. The company shall ensure that information shares with analysts and research personnel are not UPSI.

8. The Company shall ensure that the UPSI are handled on need-to-now basis.

This Code is subject to review from time to time.

For, GSL Nova Petrochemicals Limited

Sunil Kumar Gupta Managing Director

DIN: 00008344

Date: 30th May, 2015.