



G.S. AUTO INTERNATIONAL LTD.



Ref: GSA: FIN: 2015

Dated: 15.05.2015

Department of Corporate Services,
Bombay Stock Exchange Limited,
Floor 25, Phiroze Jeejeebhoy Towers,
Dalal Street, MUMBAI-400001

SUB: Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

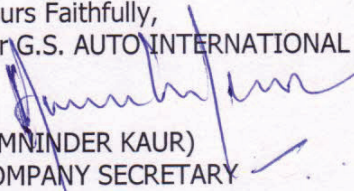
Pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015, this is to inform you that the Company has formulated and published on its website, the Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information ("Code of Fair Disclosure") as approved by the Board of Directors on 14.05.2015. A copy of Code of Fair Disclosure is enclosed herewith effective from 15.05.2015.

The Company has also formulated the Code of Conduct to regulate, monitor and report trading by its employees and other connected persons ("Code of Conduct") and the same has been approved by the Board of Directors of the Company on 14.05.2015.

Kindly take the same on your records.

Thanking You,

Yours Faithfully,
For G.S. AUTO INTERNATIONAL LIMITED


(AMNINDER KAUR)
COMPANY SECRETARY



G.S. AUTO INTERNATIONAL LTD.



Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

[As originally approved and adopted under sub-regulation (1) of regulation 8 on 14.05.2015]

Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**Insider Regulations**") prescribes all listed companies to formulate and publish on its official website a 'Code of practices and procedures for fair disclosure of unpublished price sensitive information' ("**Code of Fair Disclosure**") as per Schedule A of the Insider Regulations.

1. Preface

- 1.1 SEBI vide its Circular No. No. LAD-NRO/GN/2014-15/21/85 dated 15.01.2015 has introduced the Insider Regulations to be effective from 15.05.2015.
- 1.2 Regulation 8 in Chapter IV of SEBI (Prohibition of Insider Trading) Regulations, 2015 provides for the formulation of a Code of Fair Disclosure.
- 1.3 The Code of Fair Disclosure shall be applicable to the Promoters, Key Managerial Personnel, Board Members and Employees of the Company.

2. Prompt public disclosure of Unpublished price sensitive information.

- 2.1 There shall be 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.
- 2.2 There shall be uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 2.3. The Compliance Officer of the Company shall act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 2.4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

3. Responding to market rumors.





G.S. AUTO INTERNATIONAL LTD.



3.1 There shall be appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

4. Information sharing with Analysts

4.1 The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

4.2 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.

5. Information handling on need to know basis

5.1 All unpublished price sensitive information shall be handled on a need-to-know basis.

