

15<sup>th</sup> May, 2015

To,

Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001.  
**Script Code : 532787**

National Stock Exchange of India  
Limited  
Exchange Plaza,  
Bandra Kurla Complex,  
Bandra (E), Mumbai-400 051  
**Script Code : ESSDEE**

Dear Sir,

**Sub: Code of Fair Disclosures and Conduct under SEBI (Prohibition of Insider Trading) Regulation 2015**

We wish to inform you that Board of Directors of the Company has formulated and adopted the following which will effective from 15<sup>th</sup> May, 2015.

1. Code of practices and procedures for fair disclosure of Unpublished Price Sensitive information (UPSI) in accordance with the Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulation 2015, (copy attached for your reference).
2. Code of Conduct for regulation, monitoring and reporting of trading by insider in accordance with the Regulation 9 of SEBI (Prohibition of Insider Trading) Regulation 2015.

Kindly take the same on records.

Thanking you,

Yours faithfully,  
For **Ess Dee Aluminium Limited**



**Subir Ray**  
**Compliance Officer**



**ESS DEE ALUMINIUM LIMITED**

ESS DEE HOUSE, Akurli Road, Kandivali (East), Mumbai - 400 101. INDIA  
Tel. : +91-22-6690 8200 • Fax : +91-22-6690 8395 / 96 • Web : www.essdee.in • CIN : L27203WB2004PLC170941

**Registered Office : 1, Sagore Dutta Ghat Road, Kamarhati, Kolkata - 700 058. West Bengal**

**Code of Practices and Procedures for Fair disclosure of Unpublished Price Sensitive Information (As envisaged under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulation 2015.**

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Principle of Fair disclosure for purpose of code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information:

1. The Company shall promptly disclosed to the Public all the Unpublished Price Sensitive Information that would impact price discovery no sooner to the credible and concrete information comes into bring in order to make such information generally available
2. The Company shall follow Uniform and universal dissemination of unpublished price sensitivity information to avoid selective disclosure.
3. The Compliance officer of the Company shall act as a Chief Investor Relation Officer of the Company to deal with dissemination of information and disclosure of unpublished price sensitivity information.
4. In the event of any UPSI getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of UPSI as generally available, by publishing same on Company's website [www.essdee.in](http://www.essdee.in)
5. The Company shall ensure appropriate and fair response to queries on news reports and request for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with the analysis and research personnel is not unpublished price sensitivity information.
7. The Company shall develop best practice to make transcripts and records of proceeding of meetings with analyst and other investor relation conference on the official website to ensure official confirmation and documentation of disclosure made.
8. The Company shall handle all UPSI on a need to know basis.

The Code shall effective from 15<sup>th</sup> May, 2015



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