



KILBURN ENGINEERING LTD.

PLOT NO. 6, MIDC-SARAVALI, KALYAN BHIWANDI ROAD, TALUKA BHIWANDI, DIST. THANE - 421 311. MAHARASHTRA, INDIA
Tel : 91-2522-663800 / 662200 Fax : 91-2522-281026 / 280166 E-mail : kilburn@bom3.vsnl.net.in Website : www.kilburnengg.com

3rd June 2015

The Secretary,
Bombay Stock Exchange Ltd.,
P.J. Towers, Dalal Street,
MUMBAI-400 001.

Scrip Code : 522101

The Secretary,
The Calcutta Stock Exchange Association Ltd.,
Exchange Association Ltd.,
7, Lyons Range,
KOLKATA-700 001.

Scrip Code: 21022

Dear Sirs,

Codes under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

We had informed vide our letter dated 28th May, 2015 that the Board of Directors of the Company at the Meeting held on 28th May, 2015 approved the following Codes under the SEBI (Prohibition of Insider Trading) Regulations, 2015:

- a) Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.
- b) KILBURN ENGINEERING LTD. Code of Conduct for Prevention of Insider Trading – 2015.

We are submitting the ' Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' for your records. The same has also been displayed on the website of our company.

Yours faithfully,
For KILBURN ENGINEERING LTD.

(ARVIND BAJORIA)
COMPANY SECRETARY &
Sr. MANAGER (COSTING)

Encl : as above

AN ISO-9001 : 2000 CERTIFIED COMPANY

REGD. OFFICE : FOUR MANGOE LANE, SURENDRA MOHAN GHOSH SARANI, KOLKATA - 700 001, INDIA
E-MAIL : kilbncal@cal2.vsnl.net.in CIN : L24232WB1987PLC042956



A Williamson Magor Group Enterprise



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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION.

[Formulated pursuant to Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015.]

PREAMBLE

The Company is committed to secure the interests of its Shareholders and Investors and ensure transparency over transactions in its Securities. In this endeavor, the Company adheres to the Regulation(s) framed by The Securities Exchange Board of India (SEBI), from time to time. SEBI has formulated the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, which has come into force with effect from 15th May, 2015, applicable to all Listed Companies. In terms of the said Regulations, Kilburn Engineering Limited (the 'Company') is required to formulate and publish on its official website, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. Accordingly, the Board of Directors of the Company at its Meeting held on 28th May, 2015, approved a specific Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ('Code of Fair Disclosure '). This document embodies the said Code of Fair Disclosure.

CODE OF FAIR DISCLOSURE

The Code of Fair Disclosure is in line with the above SEBI Regulations. The Principles of Fair Disclosure adopted by the Company are as follows:

- To make 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.
- To make disclosures of uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.



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- The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- To make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- To ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
- To develop and follow 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.
- To handle all unpublished price sensitive information on a need -to- know basis.

This Code shall be published on the official website of the Company.

Subsequent modification(s) / amendment (s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.

This Code can be modified by the Board of Directors of the Company as and when it may deem necessary.

