



**SECRETARIAL DEPARTMENT**

Jekegram, Pokhran Road No. 1, Thane (W) - 400 606  
Maharashtra, India  
CIN No.: L17117MH1925PLC001208  
Tel: (91-22) 4036 7000 / 6152 7000  
Fax: (91-22) 2541 2805  
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June 26, 2015

The Department of Corporate Services - CRD  
BSE Limited  
P.J. Towers, Dalal Street,  
Mumbai - 400 001  
Fax No.22722037 / 39 / 41  
Scrip Code: 500330

The National Stock Exchange of India Ltd  
Exchange Plaza, 5th Floor,  
Bandra-Kurla Complex  
Bandra (East)  
Mumbai - 400 051  
Fax No. 6641 8125/26  
Scrip Code: RAYMOND EQ

Luxembourg Stock Exchange  
Societe De La De Luxembourg Societe,  
35A, Boulevard Joseph II,  
L-1840 Luxembourg

Dear Sirs:

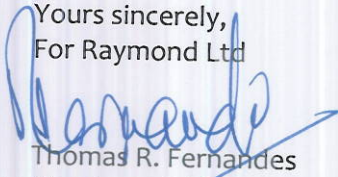
**Subject: Compliance with Regulation 8 and 9 of the SEBI (Prohibition of Insider Trading) Regulations 2015**

We request reference to the provisions of Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations 2015 (PIT Regulations). We have to inform you that our Company has formulated and adopted the "Raymond Ltd - Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (Fair Disclosure Code). Accordingly, we enclose a copy of the said Fair Disclosure Code. The Fair Disclosure Code has been uploaded on the Company's website at [http://raymond.in/cr/policies/fdc/fdc\\_policy.html](http://raymond.in/cr/policies/fdc/fdc_policy.html)

As required by Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 our Company has also formulated and adopted the Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades by Insiders under PIT Regulations (Internal Code of Conduct).

Thanking you,

Yours sincerely,  
For Raymond Ltd

  
Thomas R. Fernandes  
Director - Secretarial &  
Company Secretary

Encl: as above.

**CORPORATE OFFICE**

Mahindra Towers, Pandurang Budhkar Marg,  
B Wing, Worli, Mumbai - 400 018  
Tel: (022) 4034 9999 / 6152 9999  
Fax: (022) 2493 9036 / 2492 5084

**REGISTERED OFFICE**

Plot No. 156/H No. 2, Village Zadgaon,  
Ratnagiri - 415 612, Maharashtra  
Tel: (02352) 232514  
Fax: (02352) 232513



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Raymond Code of Practices and Procedures for Fair Disclosure of  
Unpublished Price Sensitive Information (“UPSI”)

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This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Raymond Limited (Raymond). This Code is consistent with the SEBI (Prohibition of Insider Trading) Regulations 2015.

The Principles of Fair Disclosure adopted by Raymond are as follows:

- a. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information Generally Available.
  - b. Uniform and universal dissemination of UPSI to avoid selective disclosure.
  - c. Designation of a senior officer as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI. The Chief Investor Relations Officer may, along with the Compliance Officer, coordinate the dissemination of UPSI.
  - d. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information Generally Available.
  - e. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
  - f. Ensuring that information shared with analysts and research personnel is not UPSI.
  - g. Developing 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.
  - h. Handling of all UPSI on a need-to-know basis.
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