

May 15, 2015

DM – Dept. of Corporate Services,
The Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai - 400 001

Ref: Scrip Code: 501150

Dear Sir,

Sub. : Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

We refer to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Securities and Exchange Board of India Circular No. CIR/ISD/01/2015 dated 11th May 2015.

The Board of Directors of the Company at its meeting held today, has adopted the following Codes;

1. Code of Conduct to Regulate, Monitor and Report trading by Insiders; and
2. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, which is also uploaded on the website of the Company viz. www.centrum.co.in. A copy of the same is attached.

Please take the above on record.

Thanking you,

Yours faithfully,

FOR CENTRUM CAPITAL LIMITED

Alpesh Shah

ALPESH SHAH
COMPANY SECRETARY



Encl: As above

CENTRUM CAPITAL LIMITED**Code of Practices and Procedures for
Fair Disclosure of Unpublished Price Sensitive Information**

(As envisaged under the SEBI (Prohibition of Insider Trading) Regulation, 2015)

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Centrum Capital Limited (CCL). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

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

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and/ or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
3. CCL's Chief Financial Officer serves as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information. In the absence of Chief Financial Officer, the Accounts/ Finance Head in charge will deal with the responsibility.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website www.centrum.co.in to ensure official confirmation and documentation of disclosures made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.