

# SIL Investments Limited

CIN No.-L17301RJ1934PLC002761

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SIL/

May 25, 2015

<b>M/s. Bombay Stock Exchange Limited</b> Phiroze Jeejeebhoy Towers Dalal Street, Fort Mumbai 400 001 Fax No. 022-22723121/719/22702037/39 Scrip Code: 521194	<b>M/s. National Stock Exchange of India Ltd.</b> Exchange Plaza, 5 <sup>th</sup> Floor, Plot No.C/1, G-Block, Bandra-Kurla Complex, Bandra(E), Mumbai 400 051 Fax No. (022-2659 8237/38) Scrip Code : SILINV
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## Re:- Code for Prohibition of Insider Trading

Dear Sirs,

We invite your attention to our letter dated May 13, 2015 with regard to Outcome of the Board Meeting held on May 13, 2015.

The Company had intimated to the Exchange that pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 the Company has adopted a revised Code of Internal Procedures and Conduct, and that the same shall be hosted on the Company's website.

We would now like to confirm to you that the Company has :

- Formulated and published (on its official website), "Code for Fair Disclosure of Unpublished Price Sensitive Information" pursuant to regulation 8 of the Regulations. A copy of this code is enclosed herewith for your persual, record and further needful.
- Formulated "Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company" pursuant to regulation 9 of the Regulations, and the same is available to all concerned and interested parties on the web link:

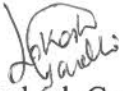
[http://silinvestments.in/pdfs/CodeforProhibitionofInsiderTrading\\_SIL.pdf](http://silinvestments.in/pdfs/CodeforProhibitionofInsiderTrading_SIL.pdf).

You are requested to take a note of the same and make available the aforesaid information as to the Code, to whosoever requires the same.

Thanking you,

Yours faithfully,

For SIL Investments Limited

  
(Lokesh Gandhi)  
Company Secretary



cc by hand delivery

**EXTRACT OF CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS ADOPTED BY THE COMPANY.**

**“Code of Fair Disclosure**

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. 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. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. 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.
8. Handling of all unpublished price sensitive information on a need-to-know basis.”

