

# ABHINANDAN ENTERPRISES LIMITED

Warden House, 340 J.J. Road, Byculla, Mumbai 400 008.

CIN No. L17119MH1984PLC217694

TEL: (91) 22 2308 4801-04 FAX : (91) 22 2307 7231

Website: [www.abhinandanenterprisesltd.com](http://www.abhinandanenterprisesltd.com)

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## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

SEBI vide its Circular No. LD-NRO/GN/2014-15/21/85, dated 15<sup>th</sup> January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15<sup>th</sup> May, 2015.

Chapter-VI of SEBI (Prohibition of Insider Trading) Regulation, 2015, Regulation 8, provides for the formulation of a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as the "Code").

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent the misuse of such information. To achieve these objectives, and in compliance with the aforesaid SEBI regulations, Abhinandan Enterprises Limited hereby notifies this code.

This Code shall be applicable upon the Directors/Officers, Designated Employees and connected persons of the Company with effect from 15<sup>th</sup> May, 2015.

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Abhinandan Enterprises Limited ("AEL").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

The Principles of Fair Disclosure for the purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information adopted by AEL are as follows: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 To promptly make public disclosure of unpublished price sensitive information that would impact price discovery.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 To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like stock exchanges and/or through widely circulated media where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
3. Compliance Officer shall serve as Chief Investor Relations Officer for the purposes of this Code to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.



*Signature*

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5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To handle all unpublished price sensitive information on a need-to-know basis only.

Mr. Sunil Y. Surve, Director of the Company, subject to approval of the Board, is authorized to amend or modify this Code in whole or in part.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information.

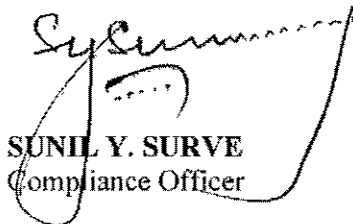
This Code shall be published on the Official Website of the Company.

This Code and every subsequent amendment made thereto shall also be intimated to the Stock Exchange where the securities of the Company are listed.

This Code has been adopted by the Board of Directors of AEL at its meeting held on 12<sup>th</sup> May, 2015, 2015 and shall be deemed to have come in to force from 15<sup>th</sup> May, 2015.

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

**For ABHINANDAN ENTERPRISES LIMITED**

  
**SUNIL Y. SURVE**  
Compliance Officer



**DATE : 12<sup>TH</sup> MAY, 2015**