

SHRI GURUDEV EN-TRADE LIMITED

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

CIN No. L29224MH1984PLC217693

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

Website: www.shrigurudevtrade.com

Email: cosec@shrigurudevtrade.com

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION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 15th January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15th 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2015, Regulation 8, provides for the formulation of a “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” (hereinafter referred to as the “Code”).

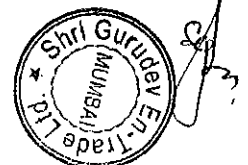
The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent the misuse of such information. To achieve these objectives, and in compliance with the aforesaid SEBI regulations, Shri Gurudev En-Trade Limited hereby notifies this code.

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

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Shri Gurudev En-Trade Limited (“SGETL”). 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The Principles of Fair Disclosure for the purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information adopted by SGETL are as follows: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 To promptly make public disclosure of unpublished price sensitive information that would impact price discovery.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 To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like stock exchanges and/or through widely circulated media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 Selective disclosure of unpublished price sensitive information is to be avoided.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.



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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.

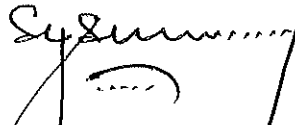
This Code shall be published on the Official Website of the Company.

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 SGETL at its meeting held on 12th May, 2015 and shall be deemed to have come in to force from 15th May, 2015.

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

For SHRI GURUDEV EN-TRADE LIMITED


SUNIL Y. SURVE
Compliance Officer



DATE : 12TH MAY, 2015