DHUNSERI INVESTMENTS LIMITED
REGISTERED OFFICE : DHUNSERI HOUSE 4A, WOODBURN PARK, KOLKATA - 700 020
CIN: L15491WB1997PLC082808

Ref. No. DIL/108/2019/ 29.03.2019

BSE Limited,
Phiroze-Jeejeebhoy Towers,
Dalal Street,
Mumbai-400 001

Fax No. : 022-22722037/39/41/61
022-22723121/3719

Scrip Code: 533336

National Stock Exchange of India Ltd.,
Exchange Plaza, C-1, Block G, 5th Floor
Bandra Kurla Complex,
Bandra (E),
Mumbai-400051

Fax No. : 022-26598237/38
022-26598347/48

Symbol : DHUNINV

Dear Sir,

Sub: Intimation under SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018

Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Board of Directors of the Company has approved and adopted the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information".

The Revised "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" is effective from April 01, 2019 and the same will be available on the website of the Company (www.dhunseriinvestments.com) with effect from this date.

The "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" has been enclosed herewith.

Please acknowledge the receipt.

Thanking you.

Yours faithfully,
For **DHUNSERI INVESTMENTS LIMITED**

Priya Agarwal

DHUNSERI INVESTMENTS LTD. Kolkata

(PRIYA AGARWAL)
Company Secretary & Compliance Officer
M. No.: 38800

Encl: as above.

DHUNSERI INVESTMENTS LIMITED
(CIN: L15491WB1997PLC082808)

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

[As per SEBI (Prohibition of Insider Trading) Regulations, 2015]

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the 'Code') in relation to the securities of the Company, is framed in terms of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, for timely and adequate disclosure of Price Sensitive Information which is likely to affect the price of Company's securities. In terms of this Code, the Company will ensure:

1. The Company will make prompt public disclosure of unpublished price sensitive information ('UPSI') that would impact price discovery, as soon as it has credible and concrete information, in order to make such information generally available i.e. make the information available to the public on a non-discriminatory basis.

2. The Company will make uniform and universal dissemination of UPSI to avoid selective disclosure.

3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with the dissemination of information and disclosure of UPSI to the investors, analysts, press and electronic / social media.

4. The Company will make prompt dissemination of UPSI that may get disclosed selectively, inadvertently or otherwise, to make such information generally available.

5. The Company will take proper steps to provide appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities.

6. The Company will ensure that the information shared with analysts and research personnel is not UPSI.

7. The Company will ensure that it would develop 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. The Company will ensure that handling of all UPSI is on a need-to-know basis. UPSI may however be disclosed to persons who need such information for furtherance of legitimate purposes, performance of duties or discharge of legal obligations in relation to the Company.

POLICY FOR DETERMINATION OF "LEGITIMATE PURPOSES"

1. The Board of Directors of a Listed Company are required to frame a Policy for Determination of "Legitimate Purposes" as a part of the "Codes of Fair Disclosure and Conduct" formulated under Regulation 8.

2. The term "Legitimate Purpose" shall include sharing of unpublished price sensitive information (UPSI) in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

3. Any person in receipt of UPSI pursuant to a "Legitimate Purpose" shall be considered an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations.

   Insider means any person who is:
   i. A connected person; or
   ii. In possession of or having access to UPSI.

4. The Board of Directors shall require the parties to execute agreements to contract Confidentiality and Non-Disclosure Obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose open offer, and shall not otherwise trade in securities of the Company when in possession of UPSI.

5. No insider shall communicate, provide, or allow access to any UPSI, relating to a Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

   Insiders can share UPSI with the external agencies only if it is in the interest of the Company and / or in compliance with the requirements of the law.

6. Communication of UPSI which is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations may be interpreted as insider trading in certain circumstances. In such doubtful cases, the person having such information shall recuse himself / herself from sharing it with third parties, without consulting the same with the Chairman, in order to avoid adverse inferences.

Amendments:

The Board of Directors shall amend the Policy, as may be required to be in line, with the changes, amendments and modifications, if any, in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Further, in case of any amendment, clarification, circular, notification etc. issued by a competent authority, which is not consistent with the provisions laid down under this Policy, the provisions of such amendment, clarification, circular, notification, etc. shall prevail and this Policy shall stand amended accordingly, without any further action, on and from the date on which such amendment, clarification, circular, notification comes into effect.