



KWALITY LIMITED

(Formerly Known as Kwaliti Dairy (India) Limited)

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CIN : L74899DL1992PLC255519

Date: 15th May, 2015

Bombay Stock Exchange Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400001 Fax No. 022- 22723121/1919/3027/2039/2061/2041	National Stock Exchange of India Limited Exchange Plaza, Plot No. C/1, G Block, Bandra- Kurla Complex Bandra (E), Mumbai – 400051 Fax No. 022-26598237/38
Ref.: Kwaliti Limited (KWALITYLTD/ INE775B01025)	Ref.: Kwaliti Limited (KWALITYLTD/ INE775B01025)

Subject: Disclosure for adoption of "The Code of Conduct of Internal Procedures and Conduct to Regulating, Monitoring and Reporting of Trading by Insiders"

Dear Sir/ Madam,

This is in reference to the above captioned subject, it is hereby informed that the company has formulated and adopted "Code of Conduct for Prevention of Insider Trading" and "Code of Practices & Procedures for Fair Disclosures of Unpublished Price Sensitive Information" with effect from 15th May, 2015 as required under SEBI (Prohibition of Insider Trading) Regulations, 2015. (A Copy of the Code for fair Disclosures is enclosed as "Annexure A")

This is for your information and records.

Thanks and regards,

For Kwaliti Limited

Authorised Signatory

Encl: As above



KWALITY LIMITED

ANNEXURE-A

CODE OF PRACTICES AND PROCEEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The code aims at prompt public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery so as to make such information generally available. The disclosure shall be done no sooner than credible and concrete information comes into being in order. The code also covers the practices and procedures for fair disclosure of Unpublished Price Sensitive Information (UPSI).

1. Uniform and universal dissemination of unpublished price sensitive information (UPSI) shall be ensured to avoid selective disclosure. In case of selective dissemination of unpublished price sensitive information (UPSI) inadvertently or otherwise, it shall be ensured promptly to make such information generally available.
2. Company Secretary and Compliance Officer being the officer of the Company will be the Chief Investor Relations Officer under this code, to deal with dissemination of information and disclosure of unpublished price sensitive information (UPSI).
3. Chief Investor Relations Officer or any other authorized person shall ensure that the information shared with analyst and research personnel will not be unpublished price sensitive information and only public information to be provided.
4. Chief Investor Relations Officer wherever feasible, to avoid being misquoted or the receipt of the information flashing untrue information to mislead the investing public, wherever feasible, the company to arrange recording of such discussion/meeting.

5. Appropriate and timely responses shall be provided by Chief Investor Relations Officer wherever considered necessary to the queries of Stock Exchange, on news reports and requests for verification of market rumours. However, the company does not believe in clarifying every market rumours wherever they are unfounded and baseless.
6. Handling of all unpublished price sensitive information on a need-to-know basis and shall not be communicated, provided or allowed access to except where such communication is on furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

*** This code has been adopted in the Board Meeting of the Company held on 12th May, 2015 and is effective from 15th May, 2015**