Gandhi Special Tubes Ltd.

Regd. Off.: 201-204, Plaza, 2nd Floor, 55 Hughes Road, Next to Dharam Palace, Mumbai - 400 007.
Tel.: 2363 4179 / 2363 4183 / 2363 5042 • Fax : 91-22-2363 4392
E-mail : gstl@mtnl.net.in • Website : www.gandhitubes.com
CIN NO.: L27104MH1985PLC036004

TÜV ISO 9001:2008 & ISO/TS 16949:2009 Certified Company

Ref No: GSTL/NSE/51026001

Date: 10.06.2015

To,
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1,
G Block, Bandra-Kurla Complex,
Bandra (East), Mumbai- 400 051.

NSE Scrip Code: GANDHITUBE

Subject: Code of Conduct for prevention of Insider Trading and Code of Fair Disclosure of Unpublished Price Sensitive Information.

Dear Sir,

In terms of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, read with SEBI Circular No. CIR/ISD/01/2015 dated 11th May, 2015, we hereby confirm that Gandhi Special Tubes Limited has formulated and adopted the Code of Conduct for Prevention of Insider Trading and Code of Fair Disclosure of Unpublished Price Sensitive Information.

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is being published on the Company's Website (www.gandhispecialtubes.com). A copy of the same is enclosed for your reference and record.

Kindly take it on record and acknowledge receipt of the same.

For **Gandhi Special Tubes Limited**

Priyanka M. Borkar
Company Secretary

GANDHI SPECIAL TUBES LTD. BOMBAY

Encl: As above

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GANDHI SPECIAL TUBES LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 requires a Listed Company to formulate and publish on its official website a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" in adherence to the principles set out in Schedule A to the said Regulation.

The principles for fair disclosure, in terms of the code adopted by the Company are as follows:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery, as soon as it has credible and concrete information, in order to make such information generally available.
2. The Company shall ensure a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall serve as a Chief Investor Relations Officer for the purpose of this code to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall 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 shall ensure handling of all unpublished price sensitive information on a need-to-know basis.

Any subsequent modification(s)/ amendment (s) to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, to that extent, shall automatically apply to this code.

GANDHI SPECIAL TUBES LTD.