



GRAVITA
INDIA LIMITED

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Web. : www.gravitaindia.com
CIN No. : L29308RJ1992PLCO06870

24th June 2015

GIL/2015-16/ 40

To
The Listing Department
The National Stock Exchange of India Ltd.
Exchange Plaza, C-1, Block-G,
Bandra-Kurla Complex, Bandra (E)
Mumbai – 400 051
Fax No.: 022-26598237/38

Sub: Code of Conduct under ITC Regulations

Ref: Company Code: GRAVITA

Dear Sir/Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby confirm that Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) has been adopted by the Company. A copy of such code is enclosed herewith.

Kindly take the above on record and oblige.

Yours Faithfully

For **Gravita India Limited**

Nitin Gupta

Nitin Gupta
(Assistant Company Secretary)



Encl: As Above

SCHEDULE A**[See sub-regulation (1) of regulation 8]****Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To ensure that Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary of the Company has been designated as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
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 To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.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 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. To handle all unpublished price sensitive information on a need-to-know basis.

