

BRIGADE ENTERPRISES LIMITED

Corporate Identity Number (CIN): L85110KA1995PLC019126
Registered Office : 29th & 30th Floors, World Trade Center
Brigade Gateway Campus, 26/1, Dr. Rajkumar Road
Malleswaram - Rajajinagar, Bangalore - 560 055, INDIA
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enquiry@brigadegroup.com www.brigadegroup.com



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Ref: BEL/NSEBSE/SEBIPIT/15052015

15th May, 2015

Listing Department
National Stock Exchange of India Limited
Exchange Plaza,
Bandra Kurla Complex,
Bandra (East),
Mumbai - 400 051
Fax Nos. : 022-26598237/38

Department of Corporate Services - Listing
BSE Limited
P. J. Towers
Dalal Street,
Mumbai - 400 001
Fax Nos.: 022- 22722037/2039

Re.: Scrip Symbol: BRIGADE/Scrip Code: 532929

Dear Sir,

Sub.: SEBI (Prohibition of Insider Trading) Regulations, 2015

We would like to confirm the following pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and circular no. CIR/ISD/01/2015 dated 11th May, 2015:

- a) We have formulated and published on our website, the Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information. The copy of the same is enclosed for your records.
- b) Code of internal procedures and conduct for prevention of insider trading in the securities of Brigade Enterprises Limited has been formulated which would replace the earlier code of conduct of prevention of insider trading in the securities of Brigade Enterprises Limited.

Kindly take the above on your records.

Thanking you,

Yours faithfully,

For Brigade Enterprises Limited

P. Om Prakash
Company Secretary

Encl.: a/a

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Hotels & Resorts • Schools • Clubs • Serviced Apartments • Convention Centres
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Also at Summit@Brigade Metropolis, Whitefield Road, Mahadevapura, Bangalore 56 0048



BRIGADE ENTERPRISES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION {Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015}

Brigade Enterprises Limited (hereinafter referred to as “Company”) shall adhere to the practices and procedures detailed in this Fair Disclosure Policy document, effective May 15, 2015, in order to ensure fair disclosure of events and occurrence that could potentially impact price of listed securities of the Company in the market.

The Company shall follow the Principles of Fair Disclosures detailed hereunder:

1. Shall promptly disclose any information that could have material impact on price of Equity shares or securities of the Company (herein after called **Unpublished Price Sensitive Information‘UPSI’**);
2. To ensure equality of access to information, the Company shall ensure:
 - a) uniform & universal disclosure of UPSI through the Stock exchange(s);
 - b) public dissemination of the said information on a non-discriminatory basis;
3. The Company will make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise, in any forum in India or abroad, to make such information generally available;
4. Shall ensure that any information shared, with analysts and/or research personnel or at any investor relation conference(s), is not an UPSI.
5. Will make available transcripts or records of proceedings, if any, of meetings or conference call with analysts/investors or at other investor relations conference(s) on the website of the Company to ensure official confirmation and documentation of disclosures made.
6. Shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
7. Any information that may be potentially construed or classified as UPSI would be dealt with by the Directors and Employees of the Company only on a ‘need to know’ basis.
8. The Company Secretary of the Company shall serve as the ‘**Chief Investor Relations Officer**’ for the purposes of this Policy to deal with dissemination of information and disclosure of UPSI.

This Fair Disclosure Policy document, adopted in line with the principles set out in Schedule A of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, has been approved by the Board of Directors of the Company and shall be applicable and binding on all Directors/Employees of the Company.