



May 20, 2015

The Manager
Listing Department
National Stock Exchange of India Limited
"Exchange Plaza", C-1, Block-G
Bandra - Kurla Complex
Bandra (East)
Mumbai - 400 051

Scrip Symbol: PREMIER

Dear Sir,

**Code of Conduct in terms of SEBI (Prohibition
of Insider Trading) Regulations, 2015**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed the Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. The code is effective from May 15, 2015.

This is for your information and records.

Thanking you,

Yours faithfully,
For Premier Ltd.

Ramesh M. Tavhare
Vice President (Legal and Corporate Affairs)
& Company Secretary



Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015)

Premier Ltd. has formulated following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company will make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.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 an 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 The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.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 make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company shall ensure the handling of all unpublished price sensitive information on a need-to-know basis.

For Premier Ltd.

Ramesh M Tavhare
Vice President (Legal and Corporate Affairs)
& Company Secretary