

Swan Energy Limited

(Formerly Swan Mills Limited)

6, Feltham House, 2nd Floor, 10 J. N. Heredia Marg, Ballard Estate, Mumbai 400001.

Tel.: 022-4058 7300 • Fax : +91-22-4058 7360 • Email : swan@swan.co.in

CIN: L17100MH1909PLC000294

Website: www.swan.co.in

Swan/bse/nse

27th May, 2015

To,
Dept. of Corporate Compliances,
National Stock Exchange Limited,
Exchange Plaza, Plot No. C/1, G Block,
Bandra –Kurla Complex, Bandra-east,
Mumbai – 400 051.

Dept. of Corporate Service,
Bombay Stock Exchange Limited
P.J. Tower, Dalal Street, Fort
Mumbai – 400 001

290520150010

Dear Sir / Madam,

Ref: Company code 50 3310

Subject: Code of Conduct for Regulating, Monitoring, and Reporting trading by an Insider pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015

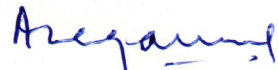
The Company has formulated the code of Conduct for Regulating, Monitoring, and Reporting trading by an Insider pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015.

Compliance Officer of the Company has been made responsible for ensuring compliance of the above code of conduct.

Thanking you,

Yours faithfully,

For Swan Energy Limited


(Arun S. Agarwal)
Company Secretary

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As per Sune

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27th May, 2015

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Bandra –Kurla Complex, Bandra-east,
Mumbai – 400 051.

Dept. of Corporate Service,
Bombay Stock Exchange Limited
P.J. Tower, Dalal Street, Fort
Mumbai – 400 001

Dear Sir / Madam,

Ref: Company code 50 3310

Subject: Code of Practices and Procedures for fair Disclosure of unpublished Price sensitive information pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015

The Company has formulated 'Code of Practices and Procedures for fair Disclosure of unpublished Price sensitive information' pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015.

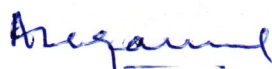
The above Code has been published on the website of the Company, i.e., www.swan.co.in

A copy of the said code is enclosed herewith for your reference.

Thanking you,

Yours faithfully,

For Swan Energy Limited



(Arun S. Agarwal)
Company Secretary

Encl: As above



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Website: www.swan.co.in

Enclosure

'Code of Practices and Procedures for fair Disclosure of unpublished Price sensitive information', pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015

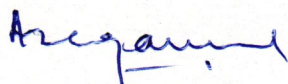
The Company shall make fair disclosure of all Unpublished Price Sensitive information and shall:

1. 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. Make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
5. Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
6. Develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website to ensure official confirmation and documentation of disclosures made.
7. Ensure handling of all unpublished price sensitive information on a need-to-know basis.

Compliance Officer of the Company shall act as chief investor relation officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

This code is subject to review by the Board from time to time.

For Swan Energy Limited



(Arun S. Agarwal)
Company Secretary