Sadbhav
TODAY FOR TOMORROW

**Ref: SEL/BSE/2015-16/02**
**May 14, 2015**

To,
The Dy. Gen. Manager,
Corporate Relationship Dept.,
**BSE Limited**
PJ Tower, Dalal Street,
Mumbai – 400 001
Fax : 022-22722037-39
**Equity Scrip Code:532710**

To,
**National Stock Exchange of India Ltd.**
Exchange Plaza,
Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E)
Mumbai - 400 051
Fax : 022-26598237-38
**Equity Scrip Name: SADBHAV**

Dear Sir,

We would like to inform you that Board of Directors of the Company on May 13, 2015 has formulated and adopted the following Codes applicable with effect from May 15, 2015 under SEBI (prohibition of Insider Trading) Regulations, 2015 :

1. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information under Regulation 8(1)
2. Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders Under Regulation 9(1)

The company has already published on its website the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and the copy of which is attached herewith.

Kindly acknowledge the documents.

Thanking you

Yours truly,
**For Sadbhav Engineering Ltd.**

**( Vijay J. Kalyani )**
**Company Secretary**

**Encl. : As above**

**Sadbhav Engineering Limited**
Regd Office : "Sadbhav House"
Opp. Law Garden Police Chowki,
Ellisbridge, Ahmedabad- 380006.
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Web : www.sadbhav.co.in
E : info@sadbhav.co.in CIN : L45400GJ1988PLC011322

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# CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

**[Under Regulation 8(1) of SEBI (prohibition of Insider Trading) Regulations, 2015]**

**(Adopted by Board of Company on May 13, 2015 and effective from May 15, 2015)**

The Board of Directors of Sadbhav Engineering Ltd. have always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. The Company shall adhere to the following principles of fair disclosure of unpublished price sensitive information with respect to it or its securities which is likely to affect price of the securities :

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 shall ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.

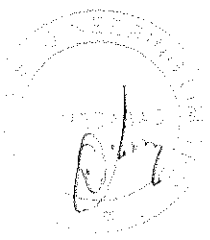
3. The Company Secretary/Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Company shall provide 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 and follow 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.



Sadbhav

8. The Company shall handle of all unpublished price sensitive information on a need-to-know basis.

The Managing Director of the Company, subject to approval of the Board, is authorized to amend or modify this Code in whole or in part.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information.

This Code shall be published on the official web site of the Company.

This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.

Subsequent modification(s)/amendment(s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.