JYOTI STRUCTURES LIMITED
Registered & Corporate Office:
Valecha Chambers, 6th Floor, New Link Road
Oshiwara, Andheri (West), Mumbai – 400 053
Corporate Identity No.: L45200MH1974PLC017494
Tel.: (91-22) 4091 5000 Fax : (91-22) 40915014 / 15
E-mail: contact@jsl.in Web site : www.jsl.in

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

30th May, 2015
LHK : RR

Dear Sir

Scrip ID: JYOTISTRUC

Sub: Code under SEBI (Prohibition of Insider Trading) Regulations 2015

Enclosed please find herewith Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information formulated under SEBI (Prohibition of Insider Trading) Regulations 2015.

Kindly acknowledge receipt of the same.

Thanking You,

Yours faithfully,
For **Jyoti Structures Limited**

JYOTI STRUCTURES LTD. MUMBAI

Company Secretary

Encl: As above

Works : ● 52A/53A, 'D' Road, Satpur, Nashik 422007. Tel. (91-253) 2351091-4 Fax: (91-253) 2351134
● 1037/1046, Urla Ind. Area, Raipur 493 221. Tel. (91-771) 2324567 Fax: (91-771) 2324767

JYOTI STRUCTURES LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Corporate Disclosure Policy

The Company shall identify a senior officer as a Chief Investor Relations Officer who would be responsible to ensure timely and adequate, uniform and universal dissemination of information and disclosure of Unpublished Price Sensitive Information (UPSI) pursuant to this Code as required under the Regulations.

The Chief Investor Relations Officer shall be responsible for

- overseeing and co-ordinating disclosure of UPSI to stock exchanges, analysts, shareholders and media; and
- handling all the UPSI on a need-to- know basis.

Responding to market rumours

The Chief Investor Relations Officer shall deal with all matters pertaining to market rumours received from the stock exchanges or from press or media or from any other sources and respond to the same in consultation with the Executive Directors.

Timely Reporting of shareholdings/ownership and changes in ownership

The Compliance Officer shall be responsible for ensuring that disclosures of shareholdings/ownership of major shareholders and disclosure of changes in ownership as required under the Stock Exchange Listing Agreements and/or any rules/regulations made under the Securities & Exchange Board of India Act, 1992, are made in a timely and adequate manner.

Disclosure/ dissemination of UPSI with special reference to analysts, institutional investors

No person, except Chief Investor Relations Officer or any other person authorized by the Board shall disclose any information relating to the Company's securities to analysts, institutional investors and research personnel. The Chief Investor Relations Officer or the authorized person, as the case may be, shall be invited to meetings / conferences organized by the Company with the analysts / institutional investors / research personnel.

The company should follow the guidelines given hereunder while dealing with analysts / institutional investors / research personnel:

i. **Only Public information to be provided** - The company shall provide only public information to the analysts / institutional investors / research personnel. Alternatively, the information given to the analysts should be simultaneously made public at the earliest.

ii. **Recording of discussion** - All the analyst, broker or institutional investor meetings shall be attended by the Chief Investor Relations Officer or the authorized person, and may be accompanied by any other senior employee of the Company as the case may be. To avoid misquoting or misrepresentation, the Chief Investor Relations Officer can make transcripts or arrangements for recording the discussions at the meeting.

iii. **Simultaneous release of information** - When a company organizes meetings with analysts / institutional investors / research personnel, the company shall make a press release or post relevant information on its website after every such meet. The company may also consider live webcasting of analyst meets.

Medium of disclosure/dissemination

The Company shall disseminate all UPSI on a continuous and in a timely manner to stock exchanges where its securities are listed and thereafter to the press.

As a good corporate practice, the UPSI disclosed to the Stock Exchanges and to the Press may also be supplemented by prompt updates on the Company's web-site. The Company may also consider other modes of public disclosure of UPSI so as to improve investor access to the same.

The information filed by the Company with the Stock Exchanges under the Stock Exchange Listing Agreement shall also be posted on the Company's website.

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