ZODIAC-JRD-MKJ LTD

DIAMONDS • JEWELLERY • PRECIOUS & SEMI PRECIOUS STONES

910, PAREKH MARKET,
39, J.S.S. ROAD, OPP. KENNEDY BRIDGE,
OPERA HOUSE, MUMBAI - 400 004. (INDIA)

TEL. : 91-22-23869731 / 91-22-23866471
FAX : 91-22-23800038
Email : account_zjml@yahoo.com
CIN : L65910MH1987PLC042107
Email : info@zodiacjrdmkjltd.com
Website : www.zodiacjrdmkjltd.com

Date : 19th June, 2015

Department of Corporate Services
BSE Limited
P.J. Towers, Dalal Street,
Mumbai – 400 001

Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra-Kurla Complex, Bandra (E),
Mumbai – 400 051

Dear Sir,

Sub : Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information

Ref : 1. BSE : Scrip Code - 512587
2. NSE : Scrip Code - ZODJRDMKJ
3. Regulation 8 – Code Fair Disclosure of SEBI (Prohibition of Insider Trading) Regulation, 2015

Pursuant to Securities And Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, we hereby confirm that the code of Practice and Procedures for fair disclosure of Unpublished Price Sensitive Information (UPSI) and Code of Conduct for insider trading are formulated and adopted by the Board of Directors of the Company by way of circulation resolution passed on 19th June, 2015. This code has also been uploaded on the Company's website www.zodiacjrdmkjltd.com.

Further, a copy of Code of Practice and Procedures for fair disclosure of Unpublished Price Sensitive Information (UPSI) is attached herewith for your records.

Kindly take the same on the record.
Thanking you.

For ZODIAC-JRD-MKJ Limited.,

Director.

Encl : a/a.

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Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information

This documents forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by ZODIAC-JRD-MKJ LIMITED (ZJML). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

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

1) To promptly make public disclosure of unpublished price sensitive information (herein after called ('UPSI') that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2) To make uniform and universal dissemination of UPSI to avoid selective disclosure.
3) The Director to be Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
4) To promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5) To make appropriate and fair response to queries on news reports and requests for verification of market rumours by regularly authorities.
6) To ensure that information shared with analysts and research personnel is not UPSI.
7) To develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conference on the official website to ensure official confirmation and documentation of disclosures made.
8) To handle all UPSI on a need-to-know basis.

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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

(1) All Directors
(2) Key managerial Personnel
(3) Senior Management Level i.e. one level before the Board as may approved from time to time.
(4) All executives working with the departments of Finance and Accounts and
(5) Any other executive as may be determined and informed by the Company from time to time.

For ZODIAC-JRD-MKJ LTD.,

DIRECTOR.

Place : Mumbai

Date : 19th June, 2015