

Date 15.05.2015

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Designation of senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing 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.



8. Handling of all unpublished price sensitive information on a need-to-know basis.



SHUKRA JEWELLERY LIMITED

Securities and Exchange Board of India (SEBI) has come up with a new set of regulation 'SEBI (Prohibition of Insider Trading) Regulation, 2015' which has been notified on 15th January 2015 and will be effective from 15th May, 2015. The 2015 regulation will repeal SEBI (Prohibition Insider Trading) Regulation 1992 which has remained the principle guideline over a decade, curbing the incidence of Insider Trading in listed securities.

In deference to the abovementioned Regulations **Shukra Jewellery Limited (hereinafter referred to as the Company)**, through its Board of Directors has formulated the following codes.

The 'Code of Fair Disclosure of Unpublished Price Sensitive Information of the Company' has been made pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, hereinafter referred to as the "Regulations".

The 'Code of Conduct for Insiders of the Company' has been made pursuant to Regulation 9 of the Regulations.

These Codes shall be applicable to Directors/Officers/Connected Person/Designated Employees of **Shukra Jewellery Limited and their immediate relatives as defined herein** and contravention of these Codes shall attract such sanctions and disciplinary actions as may be decided by the Board of Directors on case to case basis apart from the penalties under the Regulation/Act' which the Securities and Exchange Board of India Could impose upon the defaulter.

I. Definations

- (i) "Act" shall mean Securities and Exchange Board of India Act, 1992.
- (ii) "Board of Directors" means Board of Directors of Shukra Jewellery Limited as constituted from time to time which will include any of its committees.
- (iii) "Companies Act" shall mean Companies Act, 2013.



