

NILKANTH ENGINEERING LIMITED

CODE OF PRACTICE AND PROCEEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSATIVE INFORMTION

In compliance with Regulation 8(1) of SEBI(Prohibition of Insider Trading) Regulation, 2015, the Board of Directors of the Company has adopted a Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

The Code shall be applicable from 15th December, 2016

The Code as enumerated below seek to ensure timely and adequate disclosure of Unpublished Price Sensitive Information to the Stock Exchanges where the equity shares of the Company are listed and also on the official website of the Company from time to time.

1. Prompt Publication of Unpublished Price Sensitive Information:

All Unpublished Price Sensitive Information as envisaged in the SEBI(Prohibition of Insider Trading) Regulation 2015 shall be disclosed promptly in order to make such information generally available to the Public.

2. Uniform and Universal Disseminate of Unpublished Price Sensitive information

The Company shall endeavor to disseminate the Unpublished Price Sensitive Information on uniform, continuously and universal manner to all the stake holders by posting the same on the website of the Company as well as to the Stock Exchanges, where the Company is listed

3. Compliance Officer to deal with disclosure of Unpublished Price Sensitive Information

The Company Secretary of the Company who is also Compliance Officer shall be responsible to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information to the Stock Exchanges, where the Company is listed and also upload on the official website of the Company within stipulated time.

4. Prompt Dissemination of Unpublished Price Sensitive Information in respect of improper disclosures or otherwise

The Company Secretary shall avoid selective disclosure of Unpublished Price Sensitive Information. In any event, if due to oversight or inadvertence the same information is not uniformly and universally made available to all the shareholders, necessary steps shall promptly be taken to make such information generally available on a non-discriminatory basis

5. Response to the Queries on new reports and request for verification of market rumors

The Company Secretary shall ensure appropriate, fair and prompt response to all the queries received from news reports, if any. Such response from the Company shall be sent to all the Stock Exchanges, wherever the equity shares of the Company is listed

6. Sharing of Information with analyst and research personnel

The Company Secretary or any other authorized representative of the Company shall not share any Unpublished Price Sensitive Information with analyst, research personnel, prospective investors etc. In case any Unpublished Price Sensitive Information is shared with them, disclosures thereof shall be made to the Stock Exchanges simultaneously.

7. Documentation of disclosure made to the Analyst or at Investor Relation Conference

The Proceeding of the meeting with the analyst and other investor relation conferences shall be recorded and preserved and transcript / records of proceedings thereof shall be uploaded on the website of the Company.

8. Handling of all Unpublished Price Sensitive Information on need to know basis

All Unpublished Price Sensitive Information shall be handled on need to know basis i.e. the Unpublished Price Sensitive Information shall be disclosed only to those within the Company who need the information for legitimate purpose under legal litigation, to discharge the performance or duties and used only for the purpose for which it is meant for.
