



## CREATIVE EYE LIMITED

March 30, 2019.

The DCS - CRD

Bombay Stock Exchange Limited  
Pheeroze Jeejeebhoy Towers,  
Dalal Street, Fort  
Mumbai 400 001

The DCS - CRD

National Stock Exchange of India Limited  
Exchange Plaza, 5<sup>th</sup> Floor,  
Plot No - C Block, G Block,  
Bandra Kurla Complex,  
Mumbai 4000 51

Ref: BSE Scrip Code: 532392 & NSE Scrip Code: CREATIVEYE

Sub: Code of Fair Disclosure of Unpublished Price Sensitive Information- Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulation, 2015.

Dear Sir(s),

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulation, 2015, we Enclose herewith the revised Code of Fair Disclosure of Unpublished Price Sensitive Information of the Company, duly approved and adopted by the Board of Directors of the company through a resolution passed by the Circulation on March 30, 2019 in order to align with the provision of the SEBI (Prohibition of Insider Trading) (Amendments) Regulation, 2018.

The amended code shall be effective from April 1, 2019 and shall be made available on Company's website i.e. [www.creativeeye.com](http://www.creativeeye.com)

This is for your Information and Records.

Thanking you.

Yours Faithfully,

For CREATIVE EYE LIMITED

  
Khushbu Shah  
Company Secretary and Compliance Officer



Encl: As above.



# CREATIVE EYE LIMITED

## CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

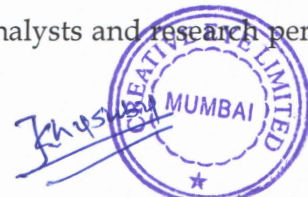
[pursuant to sub-regulation (1) of regulation 8 the SEBI (Prohibition of Insider Trading) Regulations, 2015]

Creative Eye Limited ("The Company") shall adhere to the following practices and procedure to ensure fair disclosure of price sensitive information such as the events and occurrence that would impact price of the securities of the Company.

Objective of the Code of Fair Disclosures is required for the Company to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.

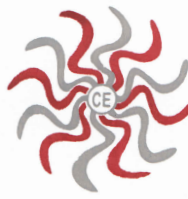
In terms of Regulation 8, As required under the said Regulations, a revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI), (Hereinafter referred to as the "Code") has been framed for adoption by the Board of Directors of the Company. The said Code shall supersede the earlier Code and shall be effective from 1 April 2019.

1. The Company shall make 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 make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company is designated as Chief Investor Relation Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. In case any unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise, the Company shall make prompt dissemination of such information to make it generally available.
5. The Company shall give 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.



Regd Office: " Kailash Plaza " Plot No. 12-A, New Link Road, Opp. Laxmi Industrial Estate Andheri (West), Mumbai- 400 053.

Tel.: (91-22) 2673 26 13 (7 Lines ) Fax: 2673 22 96 • Email: [contact@creativeeye.com](mailto:contact@creativeeye.com) • Visit Our Website : [www.creativeeye.com](http://www.creativeeye.com) • CIN :L99999MH1986PLC125721



## CREATIVE EYE LIMITED

7. The Company will make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website to ensure official confirmation and documentation of disclosures made.

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

### Sharing of UPSI for legitimate purpose:

The UPSI shall be shared by any person(s) authorized by the Board of Directors or CIO of the Company in this behalf, only in furtherance of legitimate purpose(s) which shall include the following;

(i) Sharing of UPSI in the ordinary course of business by any Insider, Designated Person, or by any Authorized person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.

(ii) Sharing of UPSI where such communication is in furtherance of performance of duty ies);

(iii) Sharing of UPSI for discharge of legal obligation(s).

(iv) Sharing of UPSI for any other genuine or reasonable purpose as may be determined by the CIO of the Company.

(v) Sharing of UPSI for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

Provided that such sharing should not be carried out to evade or circumvent the prohibitions of PIT Regulations.

(vi) Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for the purposes of the Regulations and due notice shall be given to such person(s) to maintain confidentiality of such unpublished price sensitive information in compliance with the said Regulations.

The Board of Directors may review and amend this Code from time to time.

However, other provisions / restrictions as prescribed under the SEBI (Prohibition of Insider Trading) Regulations (Amendment), 2018 or any other law for the time being in force in this behalf, as may be amended from time to time, shall be observed.

