



**BL KASHYAP**  
WE BUILD YOUR WORLD

June 03, 2019

Department of Corporate Services, BSE Limited, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001	Listing Department, National Stock Exchange of India Ltd, Exchange Plaza, Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051
ISIN Code	: INE350H01032
Scrip Code : 532719	Trading Symbol : BLKASHYAP

Dear Sir / Madam,

**Sub: Amendment in 'Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information'**

Pursuant to Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation; 2015, we hereby inform you that the Company has amended the 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive information' ("Code") of the Company, effective from 01<sup>st</sup> April 2019.

The said Code has been uploaded on the website of the Company at [www.blkashyap.com](http://www.blkashyap.com).

Kindly take the above information on your record.

Thanking you,

Yours faithfully,

For B.L. Kashyap and Sons Limited

  
Pushpak Kumar  
GM-Corporate Affairs & Company Secretary  
M. No.: F6871



Encl: as above

**B L Kashyap & Sons Ltd.**  
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## **CODE OF PRACTICES AND PROCEDURES FOR FAIRDISCLOSURE OF UNPUBLISHED PRICE SENSITIVEINFORMATION**

[As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

### **Principles of Fair Disclosure of Unpublished Price Sensitive Information:**

The Company shall adhere to the following principles of fair disclosure of Unpublished Price Sensitive Information with respect to it or its securities, which is likely to affect price of the securities:

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall ensure uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. The Company Secretary shall act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished Price Sensitive Information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company will develop best practices to make available transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle of all Unpublished Price Sensitive Information on a need to know basis.



### Sharing of UPSI for Legitimate Purpose:

The UPSI may be shared by (A) any Promoter, Director, Key Managerial Personnel, or Functional Head

(herein collectively or individually may be referred to as the "Personnel") and/or (B) such other person(s) as may be authorized by any of the said Personnel of the Company (herein referred to as the "Authorised Persons") as may be required, only in furtherance of legitimate purpose(s) which shall include any or all of the following:

1. Sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
2. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of the Regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations.
3. Any person in receipt of unpublished price sensitive information pursuant to a "Legitimate Purpose" shall be given due notice to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations. This Code shall be published on the official web site of the Company



