

JINDAL PHOTO LIMITED

Ref: JPL/Sectt./April-19/004

April 2, 2019

The Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C-1
Block – G, Bandra-Kurla Complex
Bandra (East),
Mumbai –400 051.

The Deptt of Corporate Services
The BSE Ltd
25, PJ Towers, Dalal Street
Mumbai – 400001.

Sub: **Intimation for adopting Code of practice and procedure for fair disclosure of Unpublished Price Sensitive Information.**

Code : **JINDALPHOT / 532624 Series: Eq**

Dear Sir,

Pursuant to the provisions of Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, this is to inform that the Board of Directors of the Company has amended and adopted the revised "CODE OF FAIR DISCLOSURE" incorporating therein Policy on Determination of "Legitimate Purpose" to be effective April 1, 2019, in compliance with the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

AMENDMENT IN THE CODE OF FAIR DISCLOSURE IS REPRODUCED HEREUNDER:


Policy for determination of Legitimate Purposes

- (a) "Legitimate purpose" shall mean sharing of UPSI in the course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- (b) Any person in receipt of UPSI to a legitimate purpose shall be considered an "insider" for purposes of the Regulations and due notice shall be given to such person to maintain confidentiality of such UPSI in compliance with the Regulations. Such person is also required to ensure the confidentiality of UPSI shared with him/her, in compliance with the Regulations.
- (c) There shall be limited access to UPSI. UPSI will be disclosed on need to know basis only to those persons who need the information for legitimate purposes to discharge their duty or legal obligations.

The amended code is also available on the website of the Company www.jindalphoto.com

You are requested to take above information on record.

Yours truly,
For Jindal Photo Limited


(Ashok Yadav)
Company Secretary

