



**GODFREY PHILLIPS**  
— INDIA LIMITED —

Godfrey Phillips India Limited  
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Fax: +91 11 4168 9102  
www.godfreyphillips.com

[isc-gpi@modi.com](mailto:isc-gpi@modi.com)

Date: 1<sup>st</sup> April, 2019

1. **The Secretary**  
**BSE Limited**  
**Phiroze Jeejeebhoy Towers,**  
**Dalal Street,**  
**Mumbai 400 001**
2. **The Manager**  
**Listing Department**  
**National Stock Exchange of India Limited**  
**Exchange Plaza, 5<sup>th</sup> Floor**  
**Plot No. C/1, G Block**  
**Bandra-Kurla Complex**  
**Bandra (E), Mumbai – 400 051**

**Sub: Intimation under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam,

We wish to inform you that Board of Directors at their meeting held on 2<sup>nd</sup> February, 2019, authorized Mr. R.A Shah, Chairman and Mr. K.K. Modi, Managing Director of the Company to finalize and adopt the revised "Code of Conduct for Regulation, Monitoring and Reporting of Insider Trading and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (Revised Code) incorporating therein a policy for determination of "legitimate purposes" for disclosure of UPSI, Policy for Procedure of Inquiry in case of leak of Unpublished Price Sensitive Information ("UPSI") and Whistle Blower Policy in Compliance with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

The Revised code is effective from April 1, 2019 and is available on the Company's website at <https://www.godfreyphillips.com>.

Request you to take the above information on records.

Yours faithfully,

**For Godfrey Phillips India Limited**

  
**Sanjay Gupta**  
**Company Secretary**