

**HONDA**

**POWER PRODUCTS**

**Honda Siel Power Products Ltd.**

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Greater Noida Industrial Development Area,  
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Website : www.hondasielpower.com  
CIN : L40103DL2004PLC203950  
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May 20, 2015

**Corporate Relationship Department**  
Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers,  
25<sup>th</sup> Floor, Dalal Street, Fort,  
**Mumbai – 400001**

**Listing Department**  
The National Stock Exchange of India Ltd.  
5th Floor, Exchange Plaza,  
Bandra Kurla Complex, Bandra (E),  
**Mumbai-400051**

**Sub: Regulation 8 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Madam/ Sir,


We wish to inform you that pursuant to Regulation 8(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has formulated a Code of Conduct and Procedures for Fair Disclosure of Unpublished Price Sensitive Information as prescribed under the said Regulations. Copy of the Code is enclosed for your reference and record.

We further wish to inform you that the above code along with the New Code of Conduct for regulating and reporting trading by insiders has also been updated on the website of the Company.

We request the Exchange to take the aforesaid information on record and notify your constituents accordingly.

Thanking you.

Yours truly,  
for **Honda Siel Power Products Limited,**

  
**Sunita Ganjoo**  
**Company Secretary**

Encl: as above

## Honda Siel Power Products Limited

### **CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

This document embodies the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information to be adopted by Honda Siel Power Products Limited ('the Company') and followed by its Directors, Officers, Employees and Connected Persons.

The Code seeks to ensure timely, fair and adequate disclosure of price sensitive information to the investor community by the Company to enable them to take informed investment decisions with regard to the Company's Securities.

#### **CODE OF FAIR DISCLOSURE:**

The Board of Directors of Honda Siel Power Products Limited has always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. Towards achieving this objective, the Company and the members of the Board, Officers, all employees and connected persons shall adhere to the following principles of fair disclosure of unpublished price sensitive information in letter as well as in spirit:

1. The Company shall ensure 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 unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.

7. The Company shall develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website 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.

The Board of Directors of the Company has power to suitably modify or replace this Code in part or full, as may be thought fit by them, from time to time.

This Code shall be published on the official web site of the Company.

This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.

This Code has been adopted by the Board of Directors of Honda Siel Power Products Limited in its meeting held on May 18, 2015 and shall be deemed to have come in to force from May 15, 2015. Subsequent modification(s) / amendment (s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.