



SATRA
G R O U P

ISO 9001 : 2008 Company

Satra Properties (India) Limited

Dev Plaza, 2nd floor, Opp. Andheri Fire Station, S.V.Road, Andheri (West), Mumbai - 400 058.

Tel: +91 - 22 - 2671 9999 • Fax: +91 - 22 - 2620 3999 • E-mail: info@satraproperties.in

Date: 29th May, 2015

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001
Fax: 022 – 2272 3121

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

Ref: BSE Code: 508996

Dear Sir,

In terms of the Listing Agreement executed by our Company with your Exchange, we inform that in compliance with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015, ("the Regulations"):

1. Pursuant to the requirements of regulation 8(2) of the Regulations, the Company has formulated and published on its website www.satraproperties.in the "Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information", a copy of which is enclosed herewith for your record.
2. Pursuant to the requirements of regulation 9(1) of the Regulations, the Company has formulated a Code of Internal Procedures and Code of Conduct of Prevention of Insider Trading.

Kindly take above on record and acknowledge the same.

For **Satra Properties (India) Limited**

Praful N. Satra
Chairman and Managing Director
Encl: as above



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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE

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

1. The Company shall endeavour to make prompt public disclosure of all unpublished price sensitive information(s) that may impact price discovery, as soon as credible and concrete information comes into being, in order to make such information generally available.
2. The Company shall endeavour to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company shall designate a senior officer to act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall endeavour to make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 make appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. No communication shall be made by the Company to any analyst or investor of any Unpublished Price Sensitive Information or a part thereof at any such meetings with analysts or investor conferences. The Company shall develop best practices while dealing with analysts and research personnel and to make records of proceedings or transcripts of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of the disclosures made.
8. The Company shall endeavour to put in place a system to ensure handling of all unpublished price sensitive information on a need-to-know basis.

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