



# Gulf Oil Lubricants India Limited

(formerly known as "Hinduja Infrastructure Limited")

## Corporate Office

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Mumbai - 400 093. India.  
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W [www.gulfoilindia.com](http://www.gulfoilindia.com)  
CIN: L23203TG2008PLC060190

May 26, 2015

### BSE Limited

Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400001  
Tele.: 91-22-22721233/4, 91-22-66545695  
Fax : 91-22-22721919  
Email: [corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)  
**Scrp Code:538567**  
**Scrp ID: GULFOILLUB**

### National Stock Exchange of India Ltd.

Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (E)  
Mumbai – 400 051  
Tel e: 91-22-26598235/36  
Fax : 91-22-26598237/38  
Email.: [cmlist@nse.co.in](mailto:cmlist@nse.co.in)  
**Scrp symbol: GULFOILLUB**

Dear Sir

### Sub.: Sub: Code of Fair Disclosure under Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015

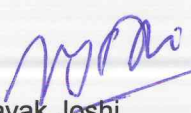
We hereby inform you that the Board of Directors of the Company has formulated the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" and revised Code of Conduct to Regulate, Monitor and Report Trading by Insiders" in compliance with Regulations 8 and 9 respectively, of the SEBI (Prohibition of Insider Trading) Regulations, 2015. In terms of Regulations 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is attached herewith and published on the website of the Company i.e. [www.gulfoilindia.com](http://www.gulfoilindia.com)

Kindly request you to take the same on record and acknowledge.

Thanking you

Yours faithfully

For Gulf Oil Lubricants India Limited

  
Vinayak Joshi  
Company Secretary &  
Compliance Officer



Encl.: as above

Registered Office: IDL Road, Kukatpally, Sanathnagar (IE) P.O., Hyderabad - 500 018.

(An ISO 9001:2008 Certified Company)



HINDUJA GROUP

# Gulf Oil Lubricants India Limited

Code of practices and procedures for fair disclosure of unpublished price sensitive information

(Sub-regulation (1) of regulation 8, of SEBI (Prohibition of Insider Trading) Regulations, 2015)

## Purpose:

It is mandatory for the Board of Directors of Gulf Oil Lubricants India Limited (the Company) to formulate and publish on its website, a Code of practices and procedures for fair disclosure of unpublished price sensitive information (Code of Fair Disclosure) that it would follow in order to adhere to each of the principles as set in Schedule A to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

## Preamble:

The Code of Fair Disclosure shall be effective from 15<sup>th</sup> May, 2015 and shall be published on the website of the Company [www.gulfoilindia.com](http://www.gulfoilindia.com). The Code of Fair Disclosure is based on the "Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information".

The Code of Fair Disclosure of Gulf Oil Lubricants India Limited (the Company) describing adherence by the Company to certain practices and procedures are aimed at ensuring fair disclosure of events and occurrences which could impact price discovery in the market for securities of the Company, are described below:

- 1) The Company shall aim to issue 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 aim to disseminate unpublished price sensitive information uniformly and universally to avoid any selective disclosures ..
- 3) Mr. Manish Kumar Gangwal, Chief Financial Officer of the Company have assumed additional responsibility of Chief Investor Relations Officer as required under this Code of Fair Disclosure.
- 4) In the unlikely event of selective disclosure inadvertently of unpublished price sensitive information, the Company shall promptly disseminate such information and generally make it available to all stakeholders, by publishing the same on Company's website [www.gulfoilindia.com](http://www.gulfoilindia.com).
- 5) The Company shall aim to provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) The Company and its Officers shall, strive to ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- 7) The Company has followed best disclosure practices and made transcript or records of proceedings of meetings with analyst and conference call with investors/analyst, available on Company's website and would continue to do so in future.
- 8) The Company shall aim to put internal process in place to restrict availability of unpublished price sensitive information on a need-to-know-basis.

