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CIN : L28129MH1962PLC012289

e-mail : info@kairacan.com
website: www.kairacan.com

KAIRA CAN COMPANY LIMITED

REGD. OFFICE : ION HOUSE, DR. E. MOSES ROAD, MAHALAXMI, MUMBAI 400 011.
Recognised Star Export House

KCCL/SEC/

1st June, 2015

The Stock Exchange, Mumbai
Corporate Relationship Dept.,
1st Floor, New Trading Ring
Rotunda Building
P.J.Towers, Dalal Street
MUMBAI – 400 001.

Dear Sir,

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

Ref : Script Code:- 504840 – Kaira Can Company Limited

In compliance with requirements of SEBI (prohibition of Insider Trading) Regulations, 2015 (the Regulation), we would like to inform you that Board of Directors of the Company on May 26th, 2015 has formulated and adopted the following Codes applicable with effect from May 15th, 2015;

- Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information under Regulation 8(1).
- Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders under Regulation 9(1).

The code of fair disclosure of Unpublished Price Sensitive Information is being published on Company's website www.kairacan.com. A copy of the same is enclosed for your reference and record.

Kindly take note of the above.

Thanking you,

Yours faithfully,
For **KAIRA CAN COMPANY LTD**

HITEN P. VANJARA
COMPANY SECRETARY



Encl: as above



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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Introduction and Objective

Kaira Can Company Limited ("the Company") is committed to transparency and fairness in dealing with all Stakeholders and in ensuring adherence to all Laws and Regulations. The Company also makes efforts to preserve the confidentiality of un-published price sensitive information and prevent misuse of such information.

Securities and Exchange Board of India vide its Notification No. LAD-NRO/GN/2014-15/21/85 dated January 15, 2015 had introduced SEBI (Prohibition of insider Trading) Regulations, 2015 to be in force with effect from May 15, 2015, repealing the earlier SEBI (Prohibition of insider Trading) Regulations, 1992.

In terms of the aforesaid Regulations, it is mandatory for every Listed Company to formulate and publish on its website, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information to be followed in order to adhere to each of the Principles with an objective to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent the misuse of such information.

In compliance with Regulation 8(1) of the aforesaid Regulations, the Board of Directors of the Company, at its Meeting held on May 26, 2015, had approved and adopted the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and made the same effective May 15, 2015. A copy of the Code is attached hereto.

1. TITLE AND COMMENCEMENT :

This Code shall be called as "Kaira Can Company Limited Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information".

It shall be effective from May 15th, 2015.

2. PRINCIPLES OF FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Code seeks ensure the timely, fair and adequate disclosure of Unpublished Price Sensitive Information to the Investor community by the Company and to enable them to take an informed investment decisions with regard to the Company's Securities. The Company endeavors to preserve the confidentiality of the Unpublished Price Sensitive Information and to prevent the misuse of such information.

Towards achieving the objective of conducting the Company's business in a fair and transparent manner with a view to protect the interest of all the Stakeholders in the Company, 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. Prompt disclosure of Price Sensitive Information

The Compliance Officer shall be responsible to 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. Avoidance of Selective Disclosure

The Company shall ensure Uniform and Universal dissemination of unpublished price sensitive information to avoid selective disclosure.



Plants : * Anand * Kanjari * Vithal Udyognagar



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3. Designation of Senior Officer to Oversee and Coordinate Disclosure:

The Compliance Officer of the Company or any other person appointed by the Board of Directors, under these Regulations shall be responsible to deal with dissemination of information and disclosure of unpublished price sensitive information. The Compliance Officer shall deal with the dissemination of Unpublished Price Sensitive Information as required under Listing Agreement entered into with the Stock Exchanges and / or as per applicable laws / directions of the Courts, Regulatory Authorities, Government Departments and other appropriate authorities Before public disclosure of the Unpublished Price Sensitive Information in accordance with this Code, the Compliance Officer shall ensure that such Unpublished Price Sensitive Information culminates in to finality so as to make the same credible and concrete to avoid speculation in the market. In other words, any Unpublished Price Sensitive Information, which is contingent upon happening and non-happening of any event, shall be disclosed in accordance with this Code only after happening or non-happening of such an event becomes definitive.

4. Prompt dissemination of inadvertently disclosed Unpublished Price Sensitive Information

The Compliance Officer shall ensure to make Prompt dissemination of such unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

In case of doubt, the Compliance Officer, shall consult to seek approval of the Managing Director and / or Executive Director before dissemination of such information.

Should any dissemination of information on behalf of the Company takes place out of accidental omission, by any Employee or Director of the Company, such Employee / Director shall forthwith inform the Compliance Officer, about such disclosure irrespective of the fact whether such information is Price Sensitive Information or not.

5. Responding to Market Rumors

The Company shall ensure to provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

The Compliance Officer in consultation with the Managing Director and / or Executive Director shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumors / report appearing in newspaper or otherwise and then decide about making the appropriate disclosures.

The Employees / Directors of the Company shall promptly direct any queries or requests for verification of market rumors received from stock exchanges or from the press or media or from any other source to the Compliance Officer.

The Compliance Officer shall on receipt of requests as aforesaid consult the Managing Director and / or Executive Director and respond to the same without any delay.



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6. Disclosure / Dissemination of Price Sensitive Information with special reference to analysts, institutional investors:

The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

For this purpose, No person, except those authorized by the Compliance Officer, shall disclose any information relating to the Company's Securities to analysts and institutional investors. Compliance Officer, shall be invited to meetings / conferences organized by the Company with the analysts / institutional investors.

7. Disclosure of information on Need-to-know basis :

The Company shall handle of all unpublished price sensitive information on a need-to-know basis.

8. Uploading of information on the Official Website

The Company shall develop best practices to make the transcripts or records of the proceedings the Meetings with analysts and other investor relations conferences available on the official website to ensure official confirmation and documentation of the disclosures made. The Company may also consider other modes of public disclosure of Price Sensitive information so as to improve investor access to the same.

Compliance Officer shall upload copy of the Press Release in the Company's website www.kairacan.com to facilitate disclosure through the use of its dedicated internet website.

3. AMENDMENT TO THE CODE

The Board of Directors authorize the Managing Director and / or the Executive Director of the Company to make such amendment(s) or modification(s) may be necessary to comply with the regulatory requirements.

Any subsequent modification(s), amendment(s) to Rules, Notifications, etc., and SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.



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