



CIN: L14101MH1945PLC256122

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Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") the Company has a Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information, as adopted by the Board of Directors of the Company at its meeting held on 30th May, 2015.

SEBI has vide notification dated December 31, 2018, amended SEBI (prohibition of Insider Trading) Regulations, 2015 effective from April 1st 2019. As required under the said Regulations, a revised Code of Practices and Procedures for Fair Disclosure of Unpublished price Sensitive Information (UPSI), (hereinafter referred to as the "Code") has been framed for adoption by the Board of Directors of the Company. The said Code shall supersede the earlier Code and shall be effective from April 1st, 2019.

Accordingly, a new Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (the "Code") for ASI Industries Limited (the "Company") is hereby framed as under:-

1. The Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery, as soon as it has credible and concrete information, in order to make such information 'generally available', i.e. to make the information accessible to the public on a non-discriminatory basis.
2. The Company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.
4. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
6. The Company shall develop 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.
7. The Company shall ensure the handling of all UPSI on a need-to-know basis.
8. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.



9. Sharing of information with Lender, customer, supplier, merchant banker, legal advisor, auditors, insolvency professional, or other advisor or consultants shall be considered as "Legitimate Purpose" "for the purpose of sharing unpublished price sensitive information in the ordinary course of business by the Insider provided that such information has not been carried out to evade or circumvent the prohibition under Regulations.
10. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "insider" and due notice shall be given to such person to maintain confidentiality of UPSI in compliance with the Regulations. The Compliance Officer shall ensure that such third party is also bound by non-disclosure or confidentiality agreements which shall also mention the duties and responsibilities of such person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of these Regulations.

This Code is subject to review from time to time.

Dated: 23.03.2019

To,
BSE Limited
Listing Department
P.J. Towers, 1't Floor,
Dalal Street, Fort,
Mumbai - 400 001

Script Name: ASIL

Script Code: 502015

Dear Sir/Madam

Sub: Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, please find enclosed the revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSD effective from 1st April, 2019).

Thanking you,

Yours Sincerely,

For ASI Industries Limited

Manoj Jain
Company Secretary and Compliance Officer
Membership No. F-7998

Encl: A/a