



Bothra Metals & Alloys Ltd.

A HOUSE OF ALUMINIUM

AN ISO 9001:2008 CERTIFIED CO.



(CIN : L27100MH2001PLC133926)

Registered Office : R. No. 15, 3rd Floor, Bothra House, 5, Assembly Lane, Dadi Seth Agyari Lane, Kalbadevi Road, Mumbai-400 002.
Tel.: 022 32120179, 67472762 • Telefax : 022 67472763 • Email : bmal_2001@bothrametals.com

June 26, 2015

The Corporate Relationship Department
The Bombay Stock Exchange (SME Platform)
25th Floor, P.J.Towers Dalal Street
Fort Mumbai

Sub : Compliance with Regulation 8 & 9 of SEBI (Prohibition of Insider Trading Regulation 2015)
Re: Script Id 535279 Script Name BMAL

Dear Sir

With reference to provisions of Section 8 & 9 of the SEBI (Prohibition of Insider Trading Regulation 2015). We have to inform you that our company has formulated and adapted the "BMAL – Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (Fair Disclosure Code). Accordingly we enclose a copy of the said Fair Disclosure Code.

As required by regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations ,2015 our Company has also formulated and adopted the Internal Code of Conduct for Regulating, Monitoring, and Reporting of Trades by Insider under PIT regulations(Internal Code of Conduct).

Thanking you

Yours Sincerely,
For Bothra Metals & Alloys Ltd.


Kuldeep Bothra
Company Secretary cum Compliance Officer



Encl : as above

Works :

Plot No. 210/110/2/1, Mouza Kheri, Trilokpur Road, Kala-Amb, Dist. Sirmour, (H.P) • Email : himachal@bothrametals.com
Plot No. C-12, Survey No. 66, Mamsa, Bhavnagar, (Gujarat) • Email : gujarat@bothrametals.com
Gut No. 34 & 228, Savli Kananwadi Village, Kananwadi Kupwad MIDC Road, Sangli, (Maharashtra) • Email : sangli@bothrametals.com
Website : www.bothrametals.com • www.indiamart.com/bothraaluminium



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Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("UPSI")

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adapted by Bothra Metals & Alloys Limited (BMAL). This Code is consistent with the SEBI(Prohibition of Insider Trading)Regulations2015.

The Principles of Fair Disclosure adapted by BMAL are as follows:

- a. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information Generally Available.
- b. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- c. Designation of a senior officer as a Chief Investor Relationship Officer to deal with dissemination of information and disclosure of UPSI. The Chief Investor Relationship Officer may, along with the Compliance Officer, coordinate the dissemination of UPSI.
- d. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information Generally Available.
- e. Appropriate and fair response to queries on news reports and request for verification on market rumors by regulatory authorities.
- f. Ensuring that information shared with analysts and research personnel in not UPSI.
- g. Developing best practices to make transcript or records of processing of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of discloses made.
- h. Handling of all UPSI on n need to know basis



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