

# Automobile Products of India Limited

CIN No.: L34103TN1949PLC055488

Unit No. F-1, 1st Floor, Shanti Nagar Co-operative Industrial  
Estate Ltd, Vakola, Santacruz (East), Mumbai - 400 055.

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18<sup>th</sup> May, 2015

To,  
**Bombay Stock Exchange Limited**  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai- 400001.

Dear Sir(s),

**Scrp Code: 505032**

**Sub: Confirmation of Formulation of Codes under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**

Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations, 2015") and SEBI Circular No. CIR/ISD/01/2015 dated 11<sup>th</sup> May, 2015 we wish to confirm that the Company has formulated following codes:

- 1) Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code of Fair Disclosures") as required under Regulation 8 of the Regulations, 2015.
- 2) Code of Conduct for Prevention of Insider Trading in Securities of Automobile Products of India Limited as required under Regulation 9(1) of the Regulations, 2015,

Please find enclosed herewith Copies of the aforesaid Codes for your records.

You are requested to kindly take note of the same.

Thanking you,

Yours Faithfully,

For **AUTOMOBILE PRODUCTS OF INDIA LIMITED**

✓   
**PRADEEP VYAS**  
**COMPLIANCE OFFICER**

Encl: as above

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## Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015)

**Automobile Products of India Limited** has formulated following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:-

- 1) The Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information that could impact price discovery no sooner than credible and concrete information comes into being in order to make such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- 2) The Company shall ensure a uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- 3) The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
- 4) The Company shall ensure prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5) The Company shall ensure an 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) 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.
- 8) The Company shall ensure the handling of all Unpublished Price Sensitive Information on a need-to know basis.

The Code has been adopted by the Board of Directors vide Circular resolution dated May 6, 2015 which is effective from May 15, 2015. This Code is subject to review from time to time.