

# NHC FOODS LTD

(Government Recognised Two Star Export House)

An ISO 22000:2005 Certified Company  
CIN : L15122GJ1992PLC076277  
GSTIN :- 27AAACM3032B1Z6



Date: 12-04-2019

To,  
The Secretary,  
**Bombay Stock Exchange Limited,**  
P.J. Towers, Dalal Street,  
Mumbai – 400001.  
E-mail: [corp.relations@bseindia.com](mailto:corp.relations@bseindia.com)  
Dear Sir,


**Sub: Amendment to Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information including policy for determination of "Legitimate Purpose"**  
**Scrip code: 517554**

This is to inform you that the Board of Directors of the company in its meeting held on 12<sup>th</sup> April, 2019 has approved the amendments to the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information including policy for determination of Legitimate purpose to align it with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and amendments thereto and SEBI (LODR) Regulations, 2015.

The Code is available on the website of the company ([www.nhcgroupp.com](http://www.nhcgroupp.com)).

Kindly take the same on your records.

For NHC FOODS LIMITED

  
**APOORVA SHAH**  
**DIRECTOR**  
**DIN: 00573184**



**Office :** D-22/8, TTC Industrial Area, MIDC, Turbhe,  
Navi Mumbai - 400705 (INDIA) Tel: +91 22-48815100  
Tel: +91 22-49747188 URL : <http://www.nhcgroupp.com>  
Email : [info@nhcgroupp.com](mailto:info@nhcgroupp.com)

**Factory & Registered Office :** Suevey No. 777, Umarsadi Desaiwad Road,  
Village Umarsadi, Taluka Pardi, Dist. Valsad, Gujarat - 396 175. (India)  
Tel. : +91 260 2375 660 / 260 2375 661 Fax : +91 260 2375 662  
email : [pardi@nhcgroupp.com](mailto:pardi@nhcgroupp.com)

# NHC FOODS LTD

(Government Recognised Two Star Export House)

An ISO 22000:2005 Certified Company

CIN : L15122GJ1992PLC076277

GSTIN :- 27AAACM3032B1Z6

## **Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)**

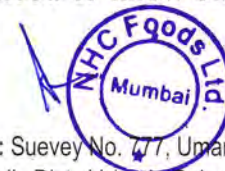
**[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]**



This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by NHC Foods limited ("NHC"). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Insider Trading Regulations")

The Principles of Fair Disclosures for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information adopted by NHC Foods are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available
2. To make disclosures of unpublished price sensitive information, as and when made, in universal and uniform manner through forum like stock exchanges and / or through widely circulated media where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided
3. Company Secretary shall serve as Chief Investor Relations Officer for the purposes of this Code to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities
6. To ensure that information shares with analysts and research personnel is not unpublished price sensitive information
7. To develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conference on official website to ensure official confirmation and documentation of disclosures made
8. To handle all unpublished price sensitive information on a need-to-know basis only



**Office :** D-22/8, TTC Industrial Area, MIDC, Turbhe,  
Navi Mumbai - 400705 (INDIA) Tel: +91 22-48815100  
Tel: +91 22-49747188 URL : <http://www.nhcgroup.com>  
Email : [info@nhcgroup.com](mailto:info@nhcgroup.com)

**Factory & Registered Office :** Suevey No. 477, Umarsadi Desaiwad Road,  
Village Umarsadi, Taluka Pardi, Dist. Valsad, Gujarat - 396 175. (India)  
Tel. : +91 260 2375 660 / 260 2375 661 Fax : +91 260 2375 662  
email : [pardi@nhcgroup.com](mailto:pardi@nhcgroup.com)



# NHC FOODS LTD

(Government Recognised Two Star Export House)

An ISO 22000:2005 Certified Company

CIN : L15122GJ1992PLC076277

GSTIN :- 27AAACM3032B1Z6



9. The Company will ensure that the dissemination of UPSI by a Designated Person is solely for "**Legitimate Purposes**".

For the purpose of this code, "Legitimate Purpose" shall include sharing UPSI with partners, collaborators, lenders, customers, suppliers, Merchant Bankers, Legal Advisors, Auditors, Insolvency professionals or other advisor or consultants in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions under the regulations.

Any person in receipt of UPSI pursuant to Legitimate Purpose shall be considered an "insider". The company shall give due notice 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 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 regulations.

The company shall enter the details of the person or entities with whom UPSI is shared in a digital base.

This code shall be published on the website of the company. The code is subject to review from time to time and every amendment thereto shall be intimated to Stock Exchanges where the securities of the company are listed. The Board of Directors of the company shall stipulate further Guidelines, procedures and practices in order to ensure Fair Disclosure of UPSI.



**Office** : D-22/8, TTC Industrial Area, MIDC, Turbhe,  
Navi Mumbai - 400705 (INDIA) Tel: +91 22-48815100  
Tel: +91 22-49747188 URL : <http://www.nhcgroup.com>  
Email : [info@nhcgroup.com](mailto:info@nhcgroup.com)

**Factory & Registered Office** : Suevey No. 777, Umarsadi Desaiwad Road,  
Village Umarsadi, Taluka Pardi, Dist. Valsad, Gujarat - 396 175. (India)  
Tel. : +91 260 2375 660 / 260 2375 661 Fax : +91 260 2375 662  
email : [pardi@nhcgroup.com](mailto:pardi@nhcgroup.com)