

ORIENT BEVERAGES LIMITED

(CIN - L15520WB1960PLC024710)

The logo for Bisleri, featuring the word "Bisleri" in white text on a teal square background.

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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading)
Regulations, 2015]

PREAMBLE

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is formed under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, which provides for formulation of a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" for the Board of Directors of the Company.

APPLICABILITY

The Board of Directors approved the Code in its meeting held on 28th July, 2015. The Code will be effective from 28th July, 2015.

PRINCIPLES OF FAIR DISCLOSURE FOR PURPOSES OF CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This Code intends to formulate framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Company's securities. So as to ensure fair disclosure of events and occurrences that could impact price discovery in the market, the Board of Directors of the Company shall adhere to the following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information envisaged in Schedule A of SEBI (Prohibition of Insider Trading) Regulation, 2015.

- i. It shall be ensured that the Unpublished Price Sensitive Information (UPSI) shall be promptly disclosed to the Stock Exchanges where the securities of the Company are listed. This will be done as soon as credible and concrete information comes into being and is available for disclosure.
- ii. Uniform and universal dissemination of UPSI would be ensured by the Company by adopting a common platform of Stock Exchanges for public disclosure. Once the UPSI is communicated to Stock Exchanges as aforesaid, then other medium of dissemination may also be used to ensure that such information is made accessible to the public on a non-discriminatory basis. The Company shall use its best endeavours to avoid selective disclosure, however if the information gets disclosed selectively due to oversight or inadvertently or otherwise, efforts will be made to make the information available for general public by sharing the same with the stock exchanges at the earliest.
- iii. The Company shall ensure that appropriate and fair responses and replies are promptly provided/given to the news report and any request for verification of market rumours received from regulatory authorities.
- iv. It shall be ensured that no UPSI is shared with analysts and research personnel.
- v. Best practices shall be followed to ensure the recordings/transcripts of the proceedings of meetings with analysts and other investor relation discussion are disseminated by publishing the same on the website of the Company.

- vi. Any information that may be classified as UPSI would be dealt with by the Directors, Employees and other connected persons on "Need to Know" basis only.
- vii. The Company Secretary of the Company would be the "Chief Investor Relation Officer" for the purpose of this Code. The Chief Investor Relation Officer is authorised by the Company to ensure proper and timely dissemination of information in the ordinary course of business and for disclosure of UPSI relating to the Company and/or its securities. In the absence of the Company Secretary, the Chief Financial Officer of the Company shall discharge his duties as above.
- viii. The Board of Directors are authorised to make such alterations to this Code, as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the SEBI Insider Trading Regulations, 2015. Further, every amendment to this code shall be promptly intimated to Stock Exchanges where the securities of the Company are listed.

For Orient Beverages Ltd.

Sd/-

N. K. Poddar

Chairman

Dated: 28.07.2015