



BEEKAY NIRYAT LIMITED

Registered Office: SP- 825, Road No.14, Vishwakarma Industrial Area, Jaipur-302013

Date: 30.05.2019

To,
The Deputy Manager
Department of Corporate Services
BSE Limited
25th Floor, P.J. Towers,
Dalal Street,
Mumbai - 400001

Ref:Beekay Niryat Limited (Scrip Code: 539546)

Subject: Code of Practice and Procedures for fair Disclosure of Unpublished Price Sensitive Information


Dear Sir/ Madam,

Pursuant to Regulation 8 (2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended, please find enclosed herewith the amended/updated "Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information."

Kindly take the information on record.

Thanking you,

Yours faithfully,
For Beekay Niryat Limited


(Sree Gopal Bajoria)
Managing Director
DIN: 01102078



Encl: As above

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BEEKAY NIRYAT LIMITED

CODE OF PRACTICES & PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider trading) Regulation, 2015]

PREFACE

SEBI (Prohibition of Insider Trading) Regulation, 2015 (“**PIT Regulations**”), make it mandatory for every listed company to formulate a Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. Accordingly, in compliance of Regulation 8(1) of PIT Regulations, as amended from time to time, this Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information (“**Code**”) has been formulated. This code also includes Policy for determination of legitimate purpose.

APPLICABILITY

This amended/ updated Code shall be effective with effect from April 01, 2019.

TERMS AND DEFINITIONS:

Words and expressions used but not defined in this Fair Disclosure Code shall have the same meaning assigned to them in the SEBI PIT Regulations or the Securities and Exchange Board of India, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 2018 or the Companies Act, 2013 and the rules and regulations made there under, as the case may be including amendment(s)/modification(s) thereto.

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

1. To promptly make public disclosure of Unpublished Price Sensitive Information (“**UPSI**”) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of UPSI in a universal and uniform manner to avoid selective disclosure.
3. In case, the Unpublished Price Sensitive Information (UPSI) gets disclosed selectively, inadvertently or otherwise, the Company should make such information generally available on prompt and immediate basis.
4. The Company shall have appropriate procedures to response the queries fairly on news reports and to request for verification of market rumors by regulatory authorities. The Chief Investor Relations Officer shall be responsible for verifying the market rumors and to give clarifications, if necessary.
5. The Company shall provide only public information to analysts and research personnel. Such information should not be Unpublished Price Sensitive Information (UPSI). In other case, the information given to analysts should be simultaneously made generally available to public.

6. Developing best practices to make transcripts or records of proceedings of meeting with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

7. All unpublished price sensitive information (UPSI), that would impact price discovery, shall be handled on a need –to – know basis.

8. The Chief Financial Officer shall act as a “Chief Investor Relations Officer” for the purpose of this code, who will deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

The Chief Investor Relations Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and coordinating Disclosure of unpublished price sensitive information to stock exchanges, analysts, shareholders, other stakeholders and media, and educating staff on disclosure policies and procedures.

9. The Company shall handle all unpublished price sensitive information on a need to know basis in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

10.”Legitimate Purpose” shall mean sharing of unpublished price sensitive information in the course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations.

11. Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an “insider” for purposes of the SEBI PIT Regulations and due notice shall be given to such person to maintain confidentiality of such unpublished price sensitive information in compliance with the said regulations. Such person is also required to ensure the confidentiality of unpublished price sensitive information shared with him/her, in compliance with the SEBI PIT Regulations.

AMENDMENT/ UPDATES

The Board of Directors of the Company may amend/modify/revise/update this Code in whole or in part, at any time, subject to any subsequent modification(s)/amendment(s) to PIT Regulations or other applicable laws, if any. In case of any provision(s) of this Code is contrary to or inconsistent with the provision(s) of PIT Regulations or other applicable laws, the provision of PIT Regulations or other applicable laws shall prevail.

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