



**MOONGIPA  
CAPITAL FINANCE LTD.**

Scrip Code: 530167

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

To,

Listing Department  
Bombay Stock Exchange Limited,  
25<sup>th</sup> Floor, P.J Towers,  
Dalal Street,  
Mumbai - 400001.

Sub: Confirmation about formulation of Company's Code of Conduct for prevention of Insider Trading in the Securities of the Company

Dear Sir

The Company hereby confirms that it has formulated its 'Code of Conduct for Prevention of Insider Trading' ('Code') in the Securities of the Company in accordance with the new SEBI (Prohibition of Insider Trading) Regulations, 2015 which will be applicable from 15<sup>th</sup> May, 2015.

This is for your information & records.

Thanking You

Yours faithfully  
For Moongipa Capital Finance Limited.

Compliance Officer



(CIN : L65993DL1987PLC028669)

Regd. Office : 18/14, W.E.A. Pusa Lane, Karol Bagh, New Delhi-110005. Ph. : 011-41450121, Fax : 011-41450122  
E-mail : moongipac@gmail.com, Website : www.moongipa.com



**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

(Principles of fair disclosure pursuant to regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A to the said Regulations)

---

The Company believes in adopting, practicing and upholding the highest standards of professionalism, honesty, integrity and ethical behavior in order to prohibit and prevent insider trading in the Company's securities. Towards this end, the Company has formulated a Code of Conduct to be followed by its directors, designated employees and advisers, consultants and retainers who, in the opinion of the Company, may have access to price sensitive information (hereinafter referred to as 'Designated Person').

The Company adopts principles, practices and procedures as under to ensure fair disclosure of unpublished price sensitive information and undertakes to follow the same:

- 1 The Company and the 'designated persons' shall maintain confidentiality of all unpublished price sensitive information (hereinafter referred to as 'UPSI'), shall communicate the same purely on 'need-to-know basis' and shall not communicate to any unauthorized person or on selective basis.
- 2 The Company shall ensure uniform and universal dissemination of UPSI to avoid any selective disclosure of such information.
- 3 The Company shall promptly disclose UPSI once such credible and concrete information comes into being.
- 4 The Company shall disclose UPSI by making its prompt disclosure with sufficient and unambiguous details to the Stock Exchange on which its securities are listed. The Company shall also disclose UPSI on its website.
- 5 In case the Company finds that any UPSI has been disclosed selectively, inadvertently or otherwise, it shall promptly disclose and disseminate as soon as the circumstances permit such information to take it uniformly and universally available to general public.
- 6 The Company designates its 'Compliance Officer' as its Chief Investor Relation Officer and entrusts him with the function of dissemination and disclosure of UPSI. The Compliance Officer is entrusted with giving appropriate and fair response to the regulatory authorities in respect of queries, questions and explanations in relation to news reports and market rumors.
- 7 The Company shall ensure that no UPSI is shared with analysts and researchers on selective basis.



(CIN : L65993DL1987PLC028669)