

Blue Coast Hotels Ltd.

415-417, Antriksh Bhawan, 22, K. G. Marg, New Delhi-110001
Tel.: +91 11 23358774-75, Fax: +91 11 23358776
Email : info@bluecoast.in, www.bluecoast.in

Blue Coast
Group of Hotels

Regd. Office: 263 C, Arossim, Cansaulim, Goa-403712, India
Tel.: +91 832 2721234, Fax: +91 832 2721235

CIN No.: L31200GA1992PLC003109

May 15, 2015

E-MAIL/COURIER/NEAPS

The Corporate Relationship Department
BSE Limited
Phiroze Jeejee bhoy Towers
1ST Floor, New Trading Ring
Rotunda Building,
Dalal Street, Fort, **Mumbai - 400 001**
FAX: 022 - 2272 2037 / 2039 / 2041 / 2061

The Secretary,
National Stock Exchange of India Ltd.
Exchange Plaza, 5TH Floor, Plot No. C-1,
G- Block, Bandra - Kurla Complex,
Bandra (E), **Mumbai - 400 051**
FAX: 022 - 2659 8237 - 8238 / 2659 8347
- 8348

Sub: Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Ref: SEBI Circular CIR ISD/01/2015, dated May 11, 2015

Dear Sir(s),

In the Context of the aforementioned SEBI Circular dated May 11, 2015 we hereby request you to kindly record that the Board of Directors has passed a resolution by circulation on May 15, 2015 for approving and adopting the following codes for the Company, to be effective from May 15, 2015:

- i. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI).
- ii. Code of Conduct to Regulate, Monitor and Report Trading by Insiders.

Thanking you,
For **Blue Coast Hotels Limited**

(Shivam Kumar)
Company Secretary

Encl: As Above (i) (ii)

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BLUE COAST HOTELS LIMITED

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FAIR DISCLOSURE OF UNPUBLISHED PRICE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

APPROVED BY : The Board of Directors of Blue Coast Hotels Limited approved by
circulation on 15th May, 2015

EFFECTIVE FROM : 15th May, 2015



This document forms the **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information** ("Code") adopted by **Blue Coast Hotels Limited** (BCHL). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

The Principles of Fair Disclosure adopted by BCHL are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are to be 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 a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
3. To designate Company Secretary of the Company, to serve as the Company's Chief Investor Relations Officer 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 shared with analysts and research personnel is not unpublished price sensitive information.
7. To record and publish proceedings of meetings with analysts and of other investor relations conferences on its official website www.bluecoasthotels.com to ensure official confirmation and documentation of disclosures made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.
9. This Code is subject to review from time to time by the Board of Directors of the Company.
10. This code was duly approved by the Board of Director of the Company through resolution by circulation on 15/05/2015 and shall come into force with effect from 15/05/2015.

For and on behalf of the Board of Directors

Date : 15th May, 2015

Place : New Delhi


Chairman & Managing Director