



Lakshmi Energy and Foods Limited

(Formerly Lakshmi Overseas Industries Ltd.)

Regd. Office: SCO 18-19, 1st Floor, Sector 9-D, Madhya Marg, Chandigarh 160 017

Corporate Identity Number: L00000CH1990PLC010573

Tel:0172-2740352 Fax: 0172-2743057 Email: corporate@lakshmgroun.in

Website: www.lakshmgroun.in

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(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This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Lakshmi Energy and Foods Limited ('the company'). 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 the company are as follows:

1. The company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The compliance officer of the company shall act as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The company will ensure that information, if shared, with analysts and research personnel are not unpublished price sensitive information.
7. The company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website (www.lakshmgroun.in) to ensure official confirmation and documentation of disclosures made.
8. The company will handle all unpublished price sensitive information on a need-to-know basis only.
