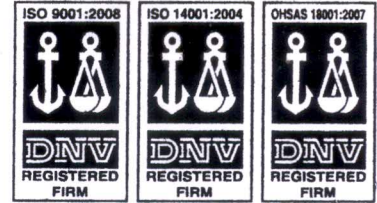


MODISON
METALS LIMITED

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E-MAIL : sales@modison.com WEB : www.modison.com
CIN NO : L51900MH1983PLC029783



CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

**(Pursuant to Regulation 8(1) and Schedule A of the SEBI (Prohibition of Insider
Trading) Regulations, 2015)**

I. PREAMBLE

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, (hereinafter referred to as the 'Regulations') mandates the listed Companies to frame a Code of Practices and Procedures for fair and timely dissemination of unpublished price sensitive information. Accordingly, Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information has been approved and implemented by the Board of Directors of the Company.

The Code seeks to ensure timely, fair and adequate disclosure of price sensitive information to the investor community with regard to the Company's Securities.

II. APPLICABILITY

This Code shall be applicable with effect from May 15, 2015.

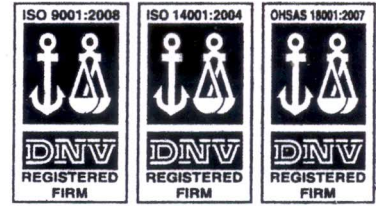
III. CODE

The Board of Directors of Modison Metals Limited have always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. Towards achieving this objective, the Company and the members of the Board, Officers, all employees and connected persons shall adhere to the following principles of fair disclosure of Unpublished Price Sensitive Information in letter as well as in spirit:-

- 1) The Company shall make prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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, to stock exchanges, where its securities are listed.
- 2) The Company shall ensure Uniform and Universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- 3) It shall be ensured that any unpublished price sensitive information which gets disclosed selectively or inadvertently, is promptly disseminated through Stock Exchanges and made generally available.

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- 4) The Company Secretary is designated as Chief Investor Relations Officer to deal with dissemination and disclosure of unpublished price sensitive information.
- 5) 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.
- 6) It shall be ensured that no unpublished price sensitive information is shared with analysts and research personnel.
- 7) Best practices shall be followed by the Company to ensure the recordings/transcripts of the proceedings of meetings with analysts and other investor relation conferences are disseminated by publishing the same on the website of the Company.
- 8) The Company shall handle all unpublished price sensitive information on need-to-know basis. This means that such information should be disclosed only to those within the Company who need to know the same in furtherance of the insider's legitimate purposes, performance of duties or discharge of his/her legal obligations.

The Managing Director of the Company, subject to the approval of Board, is authorised to amend or modify this Code in whole or in part.

This Code and every subsequent alteration/amendment in this code should be intimated to the Stock Exchange where the security of the Company is listed.

Mr. RAKESH SINGH
CHIEF EXECUTIVE OFFICER