



**INTERNAL COMMUNICATION ON "WINDOW CLOSING" UNDER SEBI  
(PROHIBITION OF INSIDER TRADING) REGULATION, 1992**



January 12, 2015

REF:CS/166BM/January 2015/11

**ALL THE MEMBERS OF THE BOARD AND DESIGNATED EMPLOYEES OF THE COMPANY**

**SUBJECT: INTIMATION ON WINDOW CLOSING UNDER INSIDER TRADING REGULATION AND COMPLIANCE OF CODE OF CONDUCT FOR PREVENTION AND REGULATION OF INSIDER TRADING IN GHCL**

This is to inform that 166<sup>th</sup> Board Meeting of the Company is scheduled to be held on **Tuesday, January 27, 2015 at New Delhi.**

The Board of Directors had approved the "Code of Conduct" for Prevention of Insider Trading within the organization. In line with the approved "Code of Conduct", read with SEBI Insider Trading Regulation, the "Trading Window" shall be closed effective from "10 days before the happening of the Price Sensitive Information or events and shall remain close upto 24 hours after the publication thereof."

"Price Sensitive Information" means any information which relates directly or indirectly to the Company and which if published is likely to materially affect the price of securities of Company;

The following, among other things, will be treated as price sensitive information: -

- i. Periodical audited or unaudited financial results of the Company, standalone or consolidated;
- ii. Intended declaration of dividends (both interim and final);
- iii. Issue of securities by way of public, bonus, rights etc or buy-back of securities;
- iv. Any major expansion plans or execution of new projects;
- v. Amalgamation, Mergers, Takeovers, or Restructuring ;
- vi. Disposal of the whole or substantial part of the undertaking;
- vii. Any significant changes in policies, plans or operations of the Company;
- viii. Any information which, if disclosed, in the opinion of the person disclosing it is likely to materially affect the prices of the securities of the Company;

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CIN : L24100GJ1983PLC006513, E-mail : ghclinfo@ghcl.co.in, Website : www.ghclindia.com

Regd. Office : GHCL House, Opp. Punjabi Hall, Near Navrangpura Bus Stand, Navrangpura, Ahmedabad-380009.



A Dalmia Brothers Enterprise



As the Board Meeting of the Company is scheduled to be held on **Tuesday, January 27, 2015** to consider inter alia reviewed un-audited financial results of the Company for the quarter ended **December 31, 2014** hence Trading Window shall be closed effective from **January 17, 2015** and shall remain closed till **January 28, 2015**.

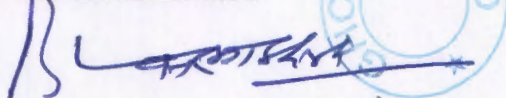
Keeping in view to the above, *all the directors and designated employees of the Company i.e. employees designated as or in the Grade of Vice President and above by the Company and all other employees of finance and Secretarial Department, and their dependent family members are prohibited to buy or sale in the shares of the company during **January 17, 2015 to January 28, 2015**.*

You are advised to adhere the code of conduct.

Thanking you,

Yours truly

For GHCL Limited

A handwritten signature in blue ink, appearing to read 'Bhushwar Mishra', is written over a circular blue stamp.

**Bhuvneshwar Mishra**  
**General Manager & Company Secretary**

CC: MD, ED (F),  
HR - for posting on notice board of the company on all locations and uploading on GHCL Connect.