

o/c

Mangal Steel Enterprises Ltd.

Date: 6th April, 2019

To
The Secretary
The Listing Department
Calcutta Stock Exchange Limited
7, Lyons Range
Kolkata- 700001

Dear Sir,

Sub: Intimation under SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref: Mangal Steel Enterprises Limited (Scrip Code: 23097)

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and amendments thereto, please find enclosed herewith the copy of Company's Policy for Legitimate purposes forming part of the Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information as effective from 1st April, 2019.

This is for your kind information and record.

Thanking you.

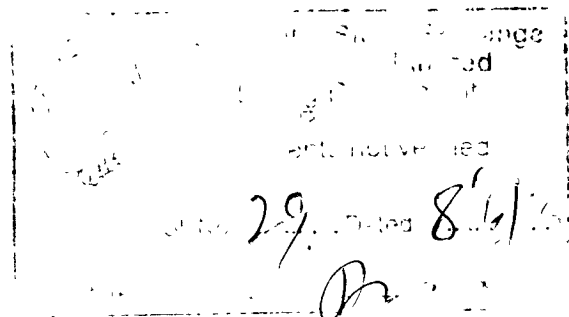
Yours faithfully,

For MANGAL STEEL ENTERPRISES LIMITED

R.K. Sharma

**(Ramesh Kumar Sharma)
Compliance Officer**

Encl: as above



POLICY FOR DETERMINATION OF "LEGITIMATE PURPOSES"

- i) The 'Legitimate Purpose' shall include sharing of Unpublished Price Sensitive Information (UPSI) in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professional or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.

The Managing Director /Chief Financial Officer of the Company severally may determine the names of other entities with whom UPSI may be shared for Legitimate Purpose or other genuine or reasonable purpose from time to time.

- ii) No insider shall communicate, provide, or allow access to any UPSI, relating to a Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- iii) No person shall procure from or cause the communication by any insider of UPSI, relating to a Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- iv) Every person who is in receipt of UPSI pursuant to a "Legitimate Purpose" shall be considered an "insider" for the purposes of this Code and due notice shall be given to such person to maintain confidentiality of the UPSI
- v) All information shall be handled within the organizations on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations. The Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons contain norms for appropriate Chinese Walls Procedures, and processes for permitting any designated person to "cross the wall".
- vi) The Company shall maintain a Structured Digital Database of recipient of such UPSI containing their names, Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available, and date and time of sharing such UPSI
- vii) The Managing Director /Compliance Officer of the Company shall review the UPSI shared for Legitimate Purposes on regular basis.
- viii) The Managing Director /Chief Financial Officer severally from time to time may also frame further strictures for sharing of such UPSI including signing of Non-Disclosure Agreements/Confidentiality Agreement to ensure use of UPSI only for legitimate purposes

Amendments

The Board of Directors shall amend the policy, as may be required to be in line with the changes, amendments and modifications, if any, in the SEBI (Prohibition of Insider Trading) Regulations, 2015. Further, in case of any amendment, clarification, circular, notification etc. issued by a competent authority, which is not consistent with the provisions laid down under this Policy, the provisions of such amendment, clarification, circular, notification, etc. shall prevail and this policy shall stand amended accordingly, without any further action, on and from the date on which such amendment, clarification, circular, notification comes into effect.