



**TRINITY TRADELINK LIMITED**

**(Formerly Omnitech Petroleum Limited)**

**CIN NO. L11103MH1985PLCO35826**

Regd. Office: #16 & 17, Washington Plaza, Dispensary Road,  
Goregaon (W), Mumbai- 400 062, Website: [www.trinitytrade.in](http://www.trinitytrade.in)

Email id: - [info@trinitytrade.in](mailto:info@trinitytrade.in), Phone No. 022 2873 0274, Fax No. 022 2873 0275

Date: - 27.05.2015

To,  
The Secretary  
The BSE Limited,  
P.J.Towers, Dalal Street  
Mumbai – 400001

**Symbol: TRITRADE**

**Group: B**

**Scrip Code: 512417**

**Sub: Securities and Exchange Board Of India (Prohibition Of Insider Trading) Regulations, 2015**

**Ref: Confirmation on compliance with Regulation- 8 and 9 of SEBI (Prohibition of Insider Trading) Regulation, 2015 (Vide SEBI Circular No. CIR/ISD/01/2015 dated May 11, 2015)**

Dear Sir / Madam,

This is to inform you that the Company, as approved by its Board of Directors, has formulated the Code of Practices and Procedure for fair Disclosure of Unpublished Price Sensitive Information (UPSI) fair disclosure in accordance with the requirement of Regulation 8 of SEBI (Prohibition of Insider Trading). This code shall come into effect from 15<sup>th</sup> May, 2015.

Similarly, we also wish to inform that the Company has formulated Code of Conduct to regulate, monitor and report trading by insiders, in accordance with the requirement of Regulation 9 of SEBI (Prohibition of Insider Trading) Regulation, 2015.

Enclosed herewith please find attached Code of Fair Disclosure and the same shall be uploaded on the website of the Company.

Kindly acknowledge and take the same on record.

Thanking You,

Yours Faithfully

For, **TRINITY TRADELINK LIMITED**  
(Formerly Omnitech Petroleum Limited)

(Formerly Omnitech Petroleum Limited)

  
Company Secretary

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**CS N SINGH**

Company Secretary &  
Compliance Officer



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**Code of Practices and Procedures for Fair Disclosure of Unpublished  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

The Board of Directors of Trinity Tradelink Limited (the "Company") are expected to manage the affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest of all the stakeholders. The Company has since time immemorial, been committed to transparency and fairness in dealing with all stakeholders.

**INTRODUCTION:**

Chapter IV of SEBI (Prohibition of Insider Trading) Regulation, 2015, Regulation 8 provides for the formulation of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (herein after referred to as the "Code").

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent the misuse of such information. To achieve these objectives, and in compliance with the aforesaid SEBI regulations, Trinity Tradelink Limited hereby notifies this code.

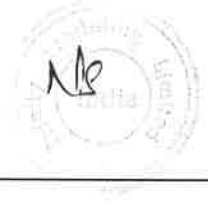
This code shall be applicable upon the Members of the Board of Directors of the Company with effect from 15<sup>th</sup> May, 2015.

Any subsequent modification and/ or amendments brought about by SEBI in the SEBI (Prohibition of Insider Trading) Regulation, 2015 shall automatically apply to this Code.

**PRINCIPLES OF FAIR DISCLOSURE FOR PURPOSES OF CODE OF PRACTICES AND PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

This Code intends to formulate a stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Securities of the Company. To achieve this objective, the members of the Board of Directors shall adhere to the following principles in letter as well as in spirit:

1. There shall be a prompt 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.





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2. The uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure shall be ensured.
3. Unless otherwise resolved by the Board of Directors, the Company Secretary of the Company shall act as the investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Unpublished price sensitive information shall be followed on a need-to-know basis.

**Disclosure of Code on Public Domain:** This code and any amendment thereof will be published on the Company's website [www.trinitytrade.in](http://www.trinitytrade.in).

**Amendment to the Code:** This code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange where the securities of the Companies are listed.

This code has been duly approved by the Board of Directors at their meeting held on 27<sup>th</sup> day of May, 2015.

