



ADC/2015-16/Misc./1

May 20, 2015

Manager - DCS Bombay Stock Exchange Ltd Phiroze Jeejeebhoy Towers Dalal Street, Fort Mumbai 400 001

Fax No: 022 22723121

Sub: Code of Fair Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Madam,

In compliance with the SEBI (Prohibition of Insider Trading) Regulations,2015 ("Regulations"), the Board of Directors of the Company at their meeting held on May 11,2015 have adopted the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code")..

As required under the said Regulations, a copy of the above Code is being forwarded to you for your record.

Thanking you,

Yours faithfully,

For ADC India Communications Limited

R. Ganesh

Company Secretary

R. Lam, 6



ADC INDIA COMMUNICATIONS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Board of Directors of ADC India Communications Limited have at their meeting held on May 11,2015 approved the following principles of fair disclosure of Unpublished Price Sensitive Information to be adopted by the Company:

- 1. To make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. To make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 4. To make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5. To provide an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- 6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- 7. To publish 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. To handle all unpublished price sensitive information on a need-to-know basis.
