May 15, 2015

Ref.: ETTL/SEC./ BSE / 05 /15-16

The BSE Limited
P.J. Towers,
Dalal Street,
Mumbai - 400 001.

Sub.: Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

In pursuance of Circular No. CIR/ISD/01/2015 dated May 11, 2015 issued by Securities and Exchange Board of India ('SEBI') and SEBI (Prohibition of Insider Trading) Regulations, 2015 ('Regulations'), we hereby confirm that the Company has:

a) Formulated and published (on its official website), "Code for Fair Disclosure of Unpublished Price Sensitive Information" pursuant to regulation 8 of the Regulations. The said code is attached herewith.
b) Formulated "Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company" pursuant to regulation 9 of the Regulations.

This is for your information and records.

Regards,
for **ETT Limited**

Puniti Sharma
Chief Financial Officer & Company Secretary

Encl.: A/a

ETT LIMITED
Express Trade Towers 3, UB, 79, Sector 34, Expressway, Gurgaon 122 001 (HR), India T: +91 124 425 7575
CORPORATE HQ Express Trade Towers 2, UB, Tower 3, B-36, Sector 132, Expressway, Noida 201 301 (UP), India T: +91 120 256 7575 F: +91 120 256 7574
REGD. OFFICE UB, 17, Hemkunt Colony, Opp. Nehru Place, New Delhi 110 048, India T: +91 11 4656 7575
E: info@ettgroup.in W: www.ettgroup.in CIN : L22122DL1993PLC123728
(An ISO 9001:2008 Company)

CODE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. INTRODUCTION

This Code for Fair Disclosure of Unpublished Price Sensitive Information ("**Code**") has been formulated by ETT Limited ("**Company**") in pursuance of regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**Regulations**"). The Code will be effective from May 15, 2015.

2. PURPOSE

The Code aims to provide a framework of practices and procedures for fair disclosure of events and occurrences which may impact the price discovery in the market for the Securities of the company listed on the stock exchanges.

3. DEFINITIONS

"**Chief Investor Relations Officer**" means the company Secretary or any other officer of the Company designated as such by the Board of Directors of the company.

"**Generally Available Information**" means information that is accessible to the public on a non – discriminatory basis.

"**Unpublished Price Sensitive Information**" or "**UPSI**" means any information, relating to the Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is to likely to materially affect the price of the Securities and shall, ordinarily including but not restricted to, information relating to the following:

1. Financial results;
2. Dividends;
3. Change in capital structure;
4. Mergers, de-mergers, acquistions, delistings, disposals and expansion of business and such other transactions;
5. Changes in key managerial personnel; and
6. Material events in accordance with the listing agreement.

The capitalized terms used but not defined herein shall have the meanings as ascribed to such terms in the Regulations.

ETT Limited
Punitc
New Delhi

4. CODE OF FAIR DISCLOSURE

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of principles is set out below:

1. 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. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.

3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. 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. Ensuring 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. Handling of all unpublished price sensitive information on a need-to-know basis.

***

ETT Limited
Purviti
New Delhi