



Adcon Capital Services Limited

ACSL/SE/2015-16
June 10, 2015

Department of Corporate Services,
Madhya Pradesh Stock Exchange Limited
"Palika Plaza" Phase - II, 201,
2nd Floor, MTH Compound,
Indore - 452 001, MP

Department of Corporate Services,
Ahmedabad Stock Exchange Limited
Kamdhenu Complex,
Opp. Sahajanand College,
Panjrapole Ahmedabad - 380015, Gujarat

Ref: SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI Circular No. CIR/ISD/01/2015 dated May 11, 2015

With reference to above captioned Regulations, 2015 and SEBI Circular dated May 11, 2015, please find attached the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" formulated and adopted by the Company.

Further, the Company has published the same on its website viz. www.adco

The above is for your kind information and record. You are requested to acknowledge receipt of the same.

Thanking you,

Yours faithfully,
For Adcon Capital Services Limited

V.S. Ranade

Vibhav S. Ranade
Company Secretary & Compliance Officer



Encl: As above

Regd. Off. : 417, Chetak Center NX, Near Hotel Shreemaya, RNT Marg, Indore - 452001. (M.P.) • Tel.: 0731-2528933

Corp. Off. : 117, Hubtown Solaris, N.S.Phadke Marg, Near East-West Flyover, Andheri (E) Mumbai - 400 069.

Tel.: 2684 4495 / 97 • Email : adconcap@gmail.com • Website : www.adconcap.com

CIN No. : L67120MP1994PLC0008511



Adcon Capital Services Limited

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION OF ADCON CAPITAL SERVICES LIMITED

Policy Title	Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information
Authorised by	Board of Directors
Effective Date	25/05/2015
Version Number	1.0

Introduction

The Securities and Exchange Board of India (SEBI), in order to ensure a suitable framework for prohibition of insider trading in securities, has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations). These Regulations are applicable to all companies whose securities are listed on stock exchanges. In terms of Regulation (8) (1) of the Regulations, the Board of Directors of these Companies are required to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to the Regulations.

Objective

The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information has been formulated with an intention to require every Company whose securities are listed on Stock Exchanges to implement a stated framework and policy for fair disclosure of events and occurrences that could impact the price discovery in the market for its securities.

Applicability

This Code of Conduct will be applicable to Directors / Officers / Designated Employees of Adcon Capital Services Limited and their immediate relatives as defined herein.

Definitions

"Unpublished price sensitive information (UPSI)" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming



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generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to –

- (i) financial results;
- (ii) Dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, de listings, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel; and
- (vi) material events in accordance with the listing agreement

"Generally available information" means information that is accessible to the public on a non - discriminatory basis.

"Immediate relative" means a spouse of a person and includes parent, sibling and child of such person or of the spouse, any of whom is either dependent financially on such person or consults such person in taking decisions relating to trading in securities.

The Principles of Fair Disclosure adopted by Adcon Capital Services Limited to ensure fair disclosure of events and occurrence that could impact price of its securities in the market are as follows:

1. The Company will make prompt disclosure of any UPSI to the stock exchange that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such information generally available.
2. The Company will make uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Compliance Officer of Adcon Capital Services Limited would be the "Chief Investor Relations Officer" of Adcon Capital Services Limited for the purpose of this code and Insider Trading Regulations. He / She is authorized by ACSL to ensure proper and timely dissemination of information in the ordinary course of business of ACSL and also to disclose UPSI relating to ACSL or its securities to the investors/ analysts, press, electronic and other concerned members of the public.
4. The Company will ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.



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5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information, if any, shared with analysts and research personnel during meetings/discussions/conferences, is not UPSI. In case any disclosure of UPSI is inadvertently made at a meeting with analysts or at any investors relation conference, which if made public could materially impact the price of the securities of ACSL on the stock exchanges, would be promptly communicated to the stock exchanges on which the securities of ACSL are listed, so as to ensure that such information is generally available to the public.
7. The Company will develop 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, if any made.
8. Any information that may be classified as UPSI would be dealt with by the Directors and concerned employees of the ACSL on "Need to Know" basis only.

Disclosure

This Code, including any amendment thereto, shall be published on the Company's official website and shall be promptly intimated to the stock exchanges where the securities are listed.

The Board of Directors may lay down further principles, rules and procedures, from time to time, to ensure fair disclosure of unpublished price sensitive information.

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