



NOTICE

All Directors, KMP and Designated Officers of the Company

Dear All,

In terms of the Regulation 9(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations') every listed company is required to frame a Code of Conduct to regulate, monitor and report trading by its employees, including the Directors, and other connected persons in relation to the securities of the company.

Insider trading occurs when any person deals in securities of a company listed or proposed to be listed by making use of some price-sensitive information which is not accessible by the public on a non-discriminatory basis as it has not been made public by the company, with an intention of making gain or avoiding loss. Insider trading is prohibited under the Regulations and such an act is an offence punishable under the SEBI Act.

The Company, being a responsible corporate citizen, takes efforts to prevent misuse and maintain confidentiality of unpublished price sensitive information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Director, Officer and Designated Employee (Collectively referred to as the 'Designated Persons') of the Company is responsible for preservation of the confidentiality of all such information obtained in their course of duty and to handle the same on 'need-to-know' basis. They must not use their knowledge of undisclosed information to gain benefit or avoid loss or to provide benefit to any third person.

In line with the Regulation 9(1) of the Regulations, and to regulate, monitor and report trading in securities of the Company by the Designated Persons and other connected persons, this Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders (hereinafter referred to as the 'Code') has been adopted by the Board of Directors of the Company.

Please note that every Designated Persons i.e. Every Director, Officer and Designated Employee, are required to disclose his holding of Securities in the Company as on the date of these Regulations taking effect i.e. May 15, 2015, to the Company within thirty days thereof i.e. June 13, 2015.

The Code and a copy of the Regulations are enclosed herewith. All persons governed by this Code are advised to peruse the Code and the Regulations carefully and acquaint themselves with all the provisions contained therein. Any clarification/assistance as necessary may be sought from the Compliance Officer.

Company Secretary & Compliance Officer

LCC INFOTECH LIMITED