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**Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Fort
Mumbai 400 001**

February 6, 2019

Sir/Madam,

Sub: Outcome of the Board Meeting

This is to inform that the meeting of the Board of Directors of the Company was held today i.e. on February 6, 2019, which commenced at 02:00 pm and concluded at 6:30 pm. The Board of Directors in their meeting have approved and taken on record the following-

1. Unaudited financial statements of the Company, (both Standalone and Consolidated) for the quarter and nine months ended December 31, 2018.
2. Policies under SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018-
 - a) Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information
 - b) Policy for Determination of Legitimate Purposes
 - c) Policy for Procedure of Inquiry in Case of Leak of Unpublished Price Sensitive Information ("UPSI")

The updated policies are enclosed herewith and will also be uploaded on the website of the Company.

Further, the Company's Policy on 'Internal Procedures for Regulating, Monitoring and Reporting of trading' shall be updated based on applicable notifications and amendments under Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, as may be notified and made applicable from time to time.

3. Sale of one non-operational/dormant business unit of the Company admeasuring 419 sq.ft. built up area situated at Mumbai.

The Statutory Auditors of the Company have carried out a Limited Review of both Standalone and Consolidated results and the reports are enclosed herewith.

Kindly take the above intimation on record and acknowledge receipt.

Thanking you,

Yours faithfully,

For ADOR FONTECH LIMITED

**Gagandeep Singh
Compliance Officer**

**Geetha D
Company Secretary**



ADOR FONTECH LIMITED

Belview 7 Haudin Road Bengaluru 560 042

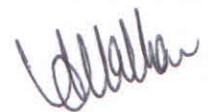
CIN# L31909KA1974PLC020010; www.adorfon.com; investorservice@adorfon.com

Statement of unaudited financial results for the quarter and nine months ended December 31, 2018

Rs.in lakhs

Sl	Particulars	Standalone						Consolidated					
		Quarter ended Dec 31, 2018	Quarter ended Sept 30, 2018	Quarter ended Dec 31, 2017	Nine months ended Dec 31, 2018	Nine months ended Dec 31, 2017	Financial year ended March 31, 2018	Quarter ended Dec 31, 2018	Quarter ended Sept 30, 2018	Quarter ended Dec 31, 2017	Nine months ended Dec 31, 2018	Nine months ended Dec 31, 2017	Financial year ended March 31, 2018
		Un audited	Un audited	Un audited	Un audited	Un audited	Audited	Un audited	Un audited	Un audited	Un audited	Un audited	Audited
1	Total income from operations (net)	4746	4916	3879	13928	10703	15474	4785	4974	3911	14072	10786	15602
2	Net Profit/(Loss) for the period (before tax exceptional and/or extraordinary items)	509	587	448	1538	719	1342	432	530	394	1327	535	1089
3	Net Profit/(Loss) for the period before tax (after exceptional and/or extraordinary items)	509	587	448	1538	719	1342	432	530	394	1327	535	1089
4	Net Profit/(Loss) for the period after tax, (after exceptional and/or extraordinary items)	327	471	277	1108	467	898	250	414	223	897	283	695
5	Total comprehensive income for the period (comprising profit/(loss) for the period (after tax) and other comprehensive income (after tax)	345	478	287	1143	501	943	268	421	233	932	317	740
6	Equity share capital	350	350	350	350	350	350	350	350	350	350	350	350
7	Reserves (excluding revaluation reserves) as shown in the Audited Balance Sheet of the previous year						10055						9577
8	Earnings per share (of Rs.2/- each) (for continuing and discontinued operations)												
	Basic	2.0	2.7	1.6	6.5	2.9	5.4	1.5	2.4	1.3	5.3	1.8	4.2
	Diluted	2.0	2.7	1.6	6.5	2.9	5.4	1.5	2.4	1.3	5.3	1.8	4.2

For Ador Fontech Limited



Place : Mumbai
Date : Feb 6, 2019

A T Malkani
Chairman

ADOR FONTECH LIMITED

Belview 7 Haudin Road Bengaluru 560 042

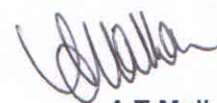
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Statement of Standalone Unaudited Financial Results for the Quarter and Nine months ended Dec 31, 2018

Rs. in lakhs

Sl No	Particulars	Quarter ended Dec 31, 2018	Quarter ended Sept 30, 2018	Quarter ended Dec 31, 2017	Nine months ended Dec 31, 2018	Nine months ended Dec 31, 2017	Financial year ended March 31, 2018
		Un audited	Un audited	Un audited	Un audited	Un audited	Audited
1	Income from operations (net)	4,702	4,856	3818	13,768	10540	15084
	Other income	44	60	61	160	163	390
	Total revenue	4,746	4,916	3,879	13,928	10,703	15,474
2	Expenses						
a	Cost of materials consumed	963	1,111	793	3,057	2354	3274
b	Purchase of stock-in-trade	1,579	1,783	1,255	4,723	3924	4984
c	Changes in invn. of fin. goods w-in-p and stock-in-trade	97	(91)	49	7	-48	364
d	Operational expenses	475	399	338	1,176	784	1118
e	Employee benefit expenses	566	579	574	1,743	1633	2381
f	Finance costs						
g	Depreciation & amortisation exp	83	78	67	239	220	302
h	Other expenses	474	470	355	1,445	1117	1709
	Total expenses	4,237	4,329	3,431	12,390	9,984	14,132
3	Profit/(loss) before exceptional items and tax	509	587	448	1,538	719	1,342
4	Exceptional items						
5	Profit/(loss) before tax	509	587	448	1,538	719	1,342
6	Tax expense						
	Current tax	155	97	156	385	247	400
	Deferred tax	27	19	15	45	5	44
	Total	182	116	171	430	252	444
7	Profit/(Loss) after tax	327	471	277	1,108	467	898
8	Other comprehensive income						
	A(i) Items that will not be reclassified to profit and loss	25	10	12	48	45	69
	(ii) Income tax relating to items that will not be reclassified to profit and loss	-7	-3	-2	-13	-11	-24
	B(i) Items that will be reclassified to profit and loss						
	(ii) Income tax relating to items that will be reclassified to profit and loss						
9	Total comprehensive income (after tax)	345	478	287	1,143	501	943
10	Paid-up equity share capital (Face value of Rs.2 per share)	350	350	350	350	350	350
11	Earnings/(losses) per share (EPS) (net of tax) (in Rs.)						
	Basic (not annualised in respect of the quarters)	2.0	2.7	1.6	6.5	2.9	5.4
	Diluted (not annualised in respect of the quarters)	2.0	2.7	1.6	6.5	2.9	5.4

For ADOR FONTECH LIMITED


A T Malkani
Chairman

Place: Mumbai

Date : Feb 6, 2019

ADOR FONTECH LIMITED

Belview 7 Haudin Road Bengaluru 560 042

CIN# L31909KA1974PLC020010; www.adorfon.com; investorservice@adorfon.com

Statement of Consolidated Unaudited Financial Results for the Quarter and Nine months ended Dec 31, 2018

		Rs. in lakhs					
Sl No.	Particulars	Quarter ended Dec 31, 2018	Quarter ended Sept 30, 2018	Quarter ended Dec 31, 2017	Nine months ended Dec 31, 2018	Nine months ended Dec 31, 2017	Financial year ended March 31, 2018
		Unaudited	Unaudited	Unaudited	Unaudited	Unaudited	Audited
1	Income from operations (net)	4740	4911	3850	13905	10621	15204
	Other income	45	63	61	167	165	398
	Total revenue	4785	4974	3911	14072	10786	15602
2	Expenses						
	a Cost of materials consumed	978	1129	803	3107	2385	3319
	b Purchase of stock-in-trade	1579	1784	1255	4723	3925	4987
	c Changes in invn. of fin. goods w-in-p and stock-in-trade	97	-91	49	7	-48	364
	d Operational expenses	475	399	338	1176	784	1118
	e Employee benefit expenses	601	614	602	1861	1719	2503
	f Finance costs	3	2	2	10	12	15
	g Depreciation & amortisation exp	95	91	79	277	254	346
	h Other expenses	525	516	389	1584	1220	1861
	Total expenses	4353	4444	3517	12745	10251	14513
3	Profit/(loss) before exceptional items and tax	432	530	394	1327	535	1089
4	Exceptional items						
5	Profit/(loss) before tax	432	530	394	1327	535	1089
6	Tax expense						
	Current tax	155	97	156	385	247	400
	Deferred tax	27	19	15	45	5	-6
	Total	182	116	171	430	252	394
7	Profit/(Loss) after tax	250	414	223	897	283	695
8	Other comprehensive income						
	A(i) Items that will not be reclassified to profit and loss	25	10	12	48	45	69
	(ii) Income tax relating to items that will not be	-7	-3	-2	-13	-11	-24
	B(i) Items that will be reclassified to profit and						
	(ii) Income tax relating to items that will be						
9	Total comprehensive income (after tax)	268	421	233	932	317	740
10	Paid-up equity share capital (Face value of Rs.2	350	350	350	350	350	#VALUE!
11	Earnings/(losses) per share (EPS) (net of tax) (in						
	Basic (not annualised in respect of the quarters)	1.5	2.4	1.3	5.3	1.8	4.2
	Diluted (not annualised in respect of the	1.5	2.4	1.3	5.3	1.8	4.2

For ADOR FONTECH LIMITED



Place: Mumbai
Date : Feb 6, 2019

A T Malkani
Chairman

Notes:

- (i) This statement has been prepared in accordance with the Companies (Indian Accounting Standards) Rules, 2015 (Ind-AS) prescribed under Section 133 of the Companies Act, 2013 and other recognised accounting practices and policies to the extent applicable.
- (ii) In terms of para 12 of Ind-AS-108, the Company views its business operations in a holistic manner and hence segment reporting is not applicable.
- (iii) Prior period items have been re-grouped wherever necessary to facilitate comparison.
- (iv) The consolidated financial results comprise Ador Fontech Limited and its wholly owned subsidiary 3D Future Technologies Private Limited.
- (v) The above results have been reviewed by the Audit Committee and approved by the Board of Directors at their meeting held on February 6, 2019.
- (vi) The Statutory Auditors have carried out a limited of the financial statements for the quarter and nine months ended December 31, 2018.

For Ador Fontech Limited



**A T Malkani
Chairman**

Place: Mumbai

Date : Feb 6, 2019




Limited Review Report – Standalone

To the Board of Directors of Ador Fontech Limited

1. We have reviewed the accompanying statement of unaudited standalone financial results (Statement) of **Ador Fontech Limited** ('the Company') for the quarter and nine months ended December 31, 2018, attached herewith, being submitted by the Company pursuant to the requirements of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as modified by Circular number CIR/CFD/FAC/62/2016 dated July 5, 2016.
2. This statement is the responsibility of the Company's Management and has been approved by the Board of Directors at their meeting held on February 6, 2019. Our responsibility is to issue a report on the Statement based on our review.
3. We conducted our review in accordance with the Standard on Review Engagement (SRE) 2410, Review of Interim Financial Information performed by the Independent Auditor of the Entity, issued by the Institute of Chartered Accountants of India. This standard requires that we plan and perform the review to obtain moderate assurance as to whether the Statement is free of material misstatement. A review is limited primarily to inquiries of Company personnel and analytical procedures, applied to financial data and thus provides less assurance than an audit. We have not performed an audit and accordingly, we do not express an audit opinion.
4. Based on our review conducted as above, nothing has come to our attention that causes us to believe that the accompanying statement prepared in accordance with applicable Indian Accounting Standards specified under Section 133 of the Companies Act, 2013 and SEBI circulars CIR/CFD/CMD/15/2015 dated November 30, 2015, and CIR/CFD/FAC/62/2016 dated July 5, 2016, and other recognised accounting practices and policies has not disclosed the information required to be disclosed in accordance with the requirements of Regulations 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, including the manner in which it is to be disclosed or that it contains any material misstatement.

For Srinivas & Subbalakshmi
Chartered Accountants
Firm Registration no.:0113505


Madan Srinivas
Partner
Membership No: 021643
Place: Bengaluru
Date: February 6, 2019



Head Office:

No. 237, 2nd Cross,
Cambridge Layout, Halasuru,
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Ph : 080-25551372
e-mail : sriandsub@gmail.com
Website : www.sriandsub.com

Branch Office:

HS1, Vikram Visthara Enclave,
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Villangudi, Madurai - 625 402
Ph : +91 8754028105
E-mail : sands.madurai@gmail.com



Limited Review Report - Consolidated

To the Board of Directors of Ador Fontech Limited

1. We have reviewed the accompanying statement of unaudited consolidated financial results (Statement) of **Ador Fontech Limited** ('the Company') for the quarter and nine months ended December 31, 2018 attached herewith, being submitted by the Company pursuant to the requirements of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as modified by Circular number CIR/CFD/FAC/62/2016 dated July 5, 2016. The covered entities are the Company - **Ador Fontech Limited** and its wholly owned subsidiary - **3D Future Technologies Private Limited**.
2. This statement is the responsibility of the Company's Management and has been approved by the Board of Directors. Our responsibility is to issue a report on the Statement based on our review.
3. We conducted our review in accordance with the Standard on Review Engagement (SRE) 2410, Review of Interim Financial Information performed by the Independent Auditor of the Entity, issued by the Institute of Chartered Accountants of India. This standard requires that we plan and perform the review to obtain moderate assurance as to whether the Statement is free of material misstatement. A review is limited primarily to inquiries of company personnel and analytical procedures, applied to financial data and thus provides less assurance than an audit. We have not performed an audit and accordingly, we do not express an audit opinion.
4. Based on our review conducted as above, nothing has come to our attention that causes us to believe that the accompanying statement prepared in accordance with applicable Indian Accounting Standards specified under Section 133 of the Companies Act, 2013 and SEBI circulars CIR/CFD/CMD/15/2015 dated November 30, 2015, and CIR/CFD/FAC/62/2016 dated July 5, 2016, and other recognised accounting practices and policies has not disclosed the information required to be disclosed in accordance with the requirements of Regulations 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, including the manner in which it is to be disclosed or that it contains any material misstatement.

For Srinivas & Subbalakshmi
Chartered Accountants
Firm Registration no.:0113505

Madan Srinivas
Partner
Membership No: 021643
Place: Bengaluru
Date: February 6, 2019



Head Office:

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E-mail : sands.madurai@gmail.com

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

[Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 & Schedule A]

1. PREFACE

This Code is made pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

2. OBJECTIVE

The objective of this Code is to formulate a framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities.

3. PRACTICES AND PROCEDURES

The following Principles of Fair Disclosure for the purposes of “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” shall be strictly followed by the Company (Ador Fontech Limited) with immediate effect:-

- a) The Company shall promptly disclose to the public "unpublished price sensitive information" (UPSI) that would impact price discovery, no sooner than such credible & concrete information comes into being.
- b) The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- c) The Company shall uniformly & universally disseminate information (UPSI) and avoid selective disclosure.
- d) The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information generally available to all/public.
- e) The Company shall render appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities, if any.
- f) The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website, in order to ensure official confirmation and documentation of disclosures made.
- g) The Company shall handle all UPSI on a need-to-know basis.



4. LEGITIMATE PURPOSE

The Unpublished price sensitive information can be shared as an exception by an Insider for Legitimate purposes as per its "Policy for determination of Legitimate Purposes" (**Annexure A**), provided it is not shared to evade or circumvent the prohibition under this Regulation.

5. LEAK/SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Board has formulated written policy for initiating appropriate inquiries on becoming aware of leak/suspected leak of unpublished price sensitive information (**Annexure B**).

6. CODE OF CONDUCT

The Company shall adhere to the prescribed standards for code of conduct to regulate, monitor and report trading by insiders, designated employees and all other applicable persons and entities.

7. CHIEF INVESTOR RELATIONS OFFICER

The Compliance Officer of the Company, has been designated / called as "Chief Investor Relations Officer" to deal with dissemination of information and disclosure of unpublished price sensitive information.

8. APPROVED AND ADOPTED

This Policy has been approved and adopted by the Board on Wednesday, February 06, 2019.

//Certified True Copy//

For Ador Fontech Limited



Gagandeep Singh
Compliance Officer



For Ador Fontech Limited



Geetha D
Company Secretary



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Annexure A

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

[Pursuant to Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018]

1. PREFACE

This Policy, as a part of "Codes of Fair Disclosure and Conduct" formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy".

This Policy is prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

2. OBJECTIVE

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as exception for the purpose of procuring unpublished price sensitive information (UPSI) relating to the Company or its listed securities or proposed to be listed securities, if any.

3. DEFINITION

a) "Legitimate Purposes" shall mean sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

1. Promoters of the Company
2. Auditors (Statutory, Internal, Branch, Cost, Secretarial, GST and any other Auditor as applicable)
3. Staff Members of the Audit firm/team conducting the Audit
4. Collaborators
5. Lenders
6. Customers
7. Suppliers
8. Bankers
9. Legal Advisors
10. Insolvency Professionals
11. Consultants
12. Any other advisors/consultants/partners
13. Any other person with whom UPSI is shared





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b) "Insider"- Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an "insider" for purpose of these regulations and due notice shall be given to such persons (Insiders) to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

4. DIGITAL DATABASE

The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities, as the case may be, with whom UPSI is shared under Regulation 3 along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Such database shall be maintained with adequate internal controls and checks, such as time stamping, audit trails, etc. to ensure non-tampering of the database.

5. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

The board of directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information

6. AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

7. APPROVED AND ADOPTED

This Policy has been approved and adopted by the Board on Wednesday, February 06, 2019.

//Certified True Copy//

For Ador Fontech Limited

Gagandeep Singh
Compliance Officer



For Ador Fontech Limited

Geetha D
Company Secretary





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Annexure B

POLICY FOR PROCEDURE OF INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION ("UPSI")

[Under Regulation 9A of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018]

1. BACKGROUND

The SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 has mandated every listed company to formulate a written policy and procedures for inquiry in case of leak of unpublished price sensitive information and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In this regard, Board of Directors of Ador Fontech Limited have laid down this policy for procedure of inquiry in case of leak of Unpublished Price Sensitive Information ('the policy'), for adoption.

2. OBJECTIVES

- (i) To strengthen the internal control system to prevent leak of UPSI.
- (ii) To restrict and prohibit the practice of sharing of UPSI, with the un-authorized person, which originates from within the company and which affects the market price of the Company as well as loss of reputation and investors' / financiers' confidence in the company.
- (iii) To have a uniform code to curb the un-ethical practices of sharing UPSI by Insiders, Employee(s) & Designated Persons with any person, firm, Company or Body Corporate.
- (iv) To initiate inquiry in case of leak of UPSI or suspected leak of UPSI and inform the same to the Securities and Exchange Board of India ("SEBI") promptly.
- (v) To penalize any Insider, Employee & Designated Persons who appears to have found guilty of violating this policy.

3. SCOPE

The Company endeavors to preserve the confidentiality of un-published price sensitive information (UPSI) and to prevent misuse of such information. The Company shall strive to restrict and prohibit the practice of sharing of UPSI which originates from within the company by any promoter, director, key managerial person, Insider, employee, designated person, support staff or any other known or un-know person(s) with any un-authorized person which affects the market price of the Company as well as causes loss of reputation and investors' / financiers' confidence in the Company.





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4. DEFINITIONS

(i) Chief Investor Relation Officer (“CIO”) shall mean the Compliance Officer of the Company appointed by the Board of Director under Securities and Exchange Board India (Listing Obligations and Disclosure Requirements) Regulations, 2015

(ii) Leak of UPSI shall mean communication of information which is / shall be UPSI by any Insider, Employee & Designated Persons or any other known or unknown person to any person other than a person(s) authorized by the Board after following the due process prescribed in this behalf in the Code of Practices Fair Disclosure of the Company and /or under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

(iii) Support Staff shall include IT staff or secretarial staff who have access to unpublished price sensitive information.

(iv) Un-published Price Sensitive Information (“UPSI”) shall mean any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily include but not restricted to, information relating to the following:

- a) Periodical financial results of the Company;
- b) Intended declaration of dividends (Interim and Final);
- c) Change in capital structure i.e. Issue of securities, buy - back of securities or any forfeiture of shares or change in market lot of the Company’s shares;
- d) Mergers, De-mergers, Amalgamation, Acquisitions, De-listing of Securities, Scheme of Arrangement or Takeover, disposals, spin off or selling division of whole or substantially whole of the undertaking and expansion of business and such other transactions;
- e) Any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company;
- f) Changes in key managerial personnel;
- g) Material events in accordance with Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; and
- h) Any other matter as may be prescribed under the Listing Regulations and/or Corporate Law to be price sensitive, from time to time.

5. DUTIES OF CHIEF INVESTOR RELATIONS OFFICER

The CIO shall be responsible to;

- (i) Oversee the Compliance of this policy.
- (ii) Report the incident of actual or suspected leak of UPSI to the Securities and Exchange Board of India.
- (iii) Intimate the incident of actual or suspected leak of UPSI to the Stock Exchanges.
- (iv) To co-ordinate with and disclose the relevant facts of the incident of actual or suspected leak of UPSI to the Enquiry committee.



Ador Fontech Limited

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6. DISCLOSURE OF ACTUAL OF SUSPECTED LEAK OF UPSI TO STOCK EXCHANGES:

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the CIO shall ensure that the same shall be promptly intimated to the Stock Exchanges on which the securities of the Company are listed in the format as set out in "Annexure C" to this policy.

7. REPORT OF ACTUAL OF SUSPECTED LEAK OF UPSI TO SEBI

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the CIO shall ensure that a report on such actual or suspect leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly made to the SEBI in the format as set out in "Annexure D" to this policy.

8. CONSTITUTION OF ENQUIRY COMMITTEE

The Board of Directors or any Committee authorized by them in this behalf, shall constitute a committee to be called as "Enquiry Committee". The Enquiry Committee shall consist of minimum 3 (three) Members which shall include Managing Director, Chief Financial Officer and Chief Investor Relation Officer and any other officer of the Company as may be mutually decided by the members of the Committee.

9. DUTIES OF ENQUIRY COMMITTEE:

The Enquiry Committee shall be responsible:-

- To conduct a preliminary enquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI, if any; and
- To authorize any person to collect necessary support material; and
- To decide disciplinary action thereon.

10. PROCEDURE FOR ENQUIRY IN CASE OF LEAK OF UPSI:

On becoming aware of suo moto or otherwise, of actual or suspected leak of Unpublished Price Sensitive Information of the Company by any promoter, director, key managerial person, Insider, employee, designated person, support staff or any other known or un-know person, the CIO after informing the same to the Managing Director or Chief Financial Officer of the Company, shall follow the below mentioned procedure in order to enquire and/or investigate the matter to ensure:-

(a) Preliminary Enquiry:

Preliminary enquiry is a fact-finding exercise. The object of preliminary enquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark on any disciplinary action.

The Enquiry Committee shall appoint and/or authorize any person(s), as it may deem fit, to initiate/conduct an enquiry to collect the relevant fact, material substances on actual or suspected leak of UPSI.



(b) Report of Preliminary Enquiry to the Enquiry Committee:

The Person(s) appointed/authorized to enquire the matter of actual or suspected leak of UPSI submit his/her report to the Enquiry Committee within 7 days from the date of his appointment on this behalf.

(c) Disciplinary Action:

The Disciplinary action(s) shall include, wage freeze, suspension, recovery, termination of employment contract/agreement etc., as may be decided by the Members of the Committee.

11. AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

//Certified True Copy//

For Ador Fontech Limited



Gagandeep Singh
Compliance Officer



For Ador Fontech Limited



Geetha D
Company Secretary



Reclamation, Fusion
Surfacing, Spraying &
Environmental Solutions

Annexure C

FORMAT FOR INTIMATION OF ACTUAL OR SUSPECTED LEAK OF UPSI TO THE STOCK EXCHANGES

To
BSE Limited
P. J. Towers, Dalal Street,
Fort, Mumbai – 400 001

Ref.: BSE Scrip Code No. 530431

Dear Sir / Madam,

Sub: Intimation of actual or suspected leak of UPSI pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of Offender, if known	
Name of Organization	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action initiated by the Company? If yes, narration of the same	Yes/No

Request you to kindly take the aforementioned on your records.

Thanking you,
Yours faithfully
For Ador Fontech Limited

Compliance Officer





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Surfacing, Spraying &
Environmental Solutions

Annexure D

FORMAT FOR REPORTING ACTUAL OR SUSPECTED LEAK OF UPSI TO THE SEBI

To,
Securities and Exchange Board of India
Plot No. C 4-A, G Block,
Near Bank of India, Bandra Kurla Complex,
Bandra East, Mumbai – 400 051

Ref.: BSE Scrip Code No. 530431

Dear Sir / Madam,

Sub: Report of actual or suspected leak of UPSI pursuant to regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015

Pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of Offender, if known	
Name of Organization	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action initiated by the Company? If yes, narration of the same	Yes/No

Request you to kindly take the aforementioned on your records.

Thanking you,
Yours faithfully
For Ador Fontech Limited

Compliance Officer

