



Aptech Limited  
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4th April, 2019

The Secretary  
Bombay Stock Exchange, Mumbai

The Manager – Listing Department  
The National Stock Exchange of India Limited

Company Scrip Code : 532475                      ISIN No. : INE266F01018

Dear Sirs,

**Sub.: Revised Policies and Codes under SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations)**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations), the company has amended following policies and code in compliance with SEBI (Prohibition of Insider Trading) (Amendment) Regulation, 2018 and available on Company's website :

1. Policy for determination of "Legitimate Purposes" for sharing Unpublished Price Sensitive Information (UPSI) - <https://www.aptech-worldwide.com/downloads/InvestorPolicy/Policyonlegitimatepurpose.pdf>
2. Policy for conducting inquiry in case of leak or suspected leak of UPSI - <https://www.aptech-worldwide.com/downloads/InvestorPolicy/PolicyProcedure-LeakofUPSI.pdf>
3. Whistle-blower policy to enable employees to report instances of leak of UPSI - <https://www.aptech-worldwide.com/downloads/code-of-conduct/WhistleBlowerPolicy.pdf>
4. Revised Code of Practices and Procedures for Fair Disclosures - <https://www.aptech-worldwide.com/downloads/code-of-conduct/CodeofPracticesandProceduresforFairDisclosures.pdf>
5. Revised Code of Conduct to Regulate, Monitor and Report Trading by Employees and Other Connected Persons, in line with the amendment in the Regulations - <https://www.aptech-worldwide.com/downloads/code-of-conduct/CodeofConductinsiderTrading.pdf>

Please take the same on your record.

Thanking you,

Yours faithfully,

For **Aptech Limited**

**Ketan H Shah**  
Company Secretary