



Date: March 28, 2019

BSE Limited

P. J. Towers, Dalal Street,
MUMBAI - 400 001.

National Stock Exchange of India Limited

Exchange Plaza, Bandra Kurla Complex,
Bandra East, Mumbai-400051.

Scrip Code: BSE: 532368 & NSE: BCG

Dear Sir,

Sub: Code of Fair Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.

We enclose herewith Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive information made pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, to be effective from April 01, 2019, which has been adopted by the Board of Directors of the Company at its meeting held on March 28, 2019.

You are requested to take the same on records.

Thanking You.

Yours truly,

for **BRIGHTCOM GROUP LIMITED**
(formerly Lycos Internet Limited)

V. SRI LAKSHMI
COMPANY SECRETARY





CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Amendment thereon)

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

- The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- The Compliance Officer of the Company appointed under the said Regulation shall act as Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
- The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- The Company will handle all unpublished price sensitive information on a need-to know basis.
- The Company will make a policy for determination of legitimate purposes.

The amended code has been adopted by the Board of Directors in its meeting held on March 28, 2019 and shall come into force from April 01, 2019.

