

Date: April 2, 2019

Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001

Listing Department
National Stock Exchange of India Limited
Bandra Kurla Complex,
Bandra East,
Mumbai – 400 051

BSE Scrip Code: 539289

NSE Symbol: MAJESCO

Dear Sir/ Madam,

Sub: Code of Fair Disclosure as per the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018

Kindly note that the Board of Directors of the Company has adopted revised Code of Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons and Immediate Relatives and Code of Fair Disclosure (effective April 1, 2019), in compliance with the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. We are enclosing hereto Code of Fair Disclosure.

You are requested to take the above on your record.

Yours faithfully,
For **Majesco Limited**


Varika Rastogi
Company Secretary

Encl: as above

“CODE OF FAIR DISCLOSURE”

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Under Regulation 8(1) of the Amendment Regulations 2018, the Company shall adhere to the below Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information.

The principles for fair disclosure, in terms of the Code adopted by the Company are as follows:

1. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. Designation of a senior officer/ IR agency as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
7. Developing 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 made.
8. Handling of all Unpublished Price Sensitive Information on a “need-to-know” basis.