

# APOLLO HOSPITALS ENTERPRISE LIMITED

CIN : L85110TN1979PLC008035



15<sup>th</sup> June, 2015

The Secretary,  
Bombay Stock Exchange Ltd (BSE)  
Phiroze Jheejheebhoy Towers,  
Dalal Street,  
Mumbai - 400 001.

**Scrip Code - 508869**  
**ISIN INE437A01024**

The Secretary,  
National Stock Exchange,  
Exchange Plaza, 5th Floor  
Plot No.C/1, 'G' Block  
Bandra - Kurla Complex  
Bandra (E)  
Mumbai - 400 051.

**Scrip Code- APOLLOHOSP**  
**ISIN INE437A01024**

The Manager  
The National Stock Exchange,  
Wholesale Debt Market  
Exchange Plaza, 5th Floor  
Plot No.C/1, 'G' Block  
Bandra - Kurla Complex  
Bandra (E)  
Mumbai - 400 051.

**ISIN INE437A07062,**  
**INE437A07070,**  
**INE437A07088**  
**& INE437A07093**

Dear Sir,

Sub:- Code of Fair Disclosure under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 - Reg.

Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015, the board of directors has adopted the following Codes effective from 15<sup>th</sup> May, 2015.

- a. Code of practices and procedures for fair disclosure of unpublished price sensitive information and
- b. Code of Conduct for prevention of Insider Trading

As required under the aforesaid Regulations, a copy of the Code of Fair Disclosure is enclosed for your reference and records. The aforementioned codes is being uploaded on the Company's website- [www.apollohospitals.com](http://www.apollohospitals.com)

Thanking you,  
Yours faithfully,  
FOR APOLLO HOSPITALS ENTERPRISES LIMITED

S M KRISHNAN  
SR. GENERAL MANAGER - FINANCE  
AND COMPANY SECRETARY

CC : The Secretary,  
Luxembourg Stock Exchange,  
B.P. 165,  
L-2011 Luxembourg.

Securities and Exchange Commission  
Division of Corporation Finance  
Office of International Corporate Finance  
450 Fifth Street, N.W.  
Washington, D.C  
20549-0302  
File No. 82-34893

**Ref : ISIN US0376081065 - Rule 144a GDR**

**ISIN US0376082055 - Reg. S GDR**

**Regd. Office :**  
19, Bishop Gardens,  
Raja Annamalaipuram,  
Chennai - 600 028.

**General Office :**  
"Ali Towers", III Floor.  
#55, Greams Road,  
Chennai - 600 006.

Tel : 044 - 28290956 / 3896 / 6681  
Telefax : 044 - 2829 0956  
Email : [apolloshares@vsnl.net](mailto:apolloshares@vsnl.net)  
Website: [www.apollohospitals.com](http://www.apollohospitals.com)

## CODE OF FAIR DISCLOSURE

### *Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information*

#### 1. Preamble

The Securities and Exchange Board of India (SEBI) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations) on January, 2015, which is effective from May 15, 2015. Pursuant to Regulation 8 of the Regulations, Apollo Hospitals Enterprise Limited, (herein after called "AHEL") is required to formulate a code of Practices and Procedures for Fair Disclosure of unpublished price sensitive information (Fair disclosure code). Accordingly a *Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information* was formulated by the Company.

#### 2. Scope

The Company endeavours to preserve the confidentiality of un-published price sensitive information (UPSI) and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations. To achieve these objectives, and in compliance with the aforesaid Regulations, AHEL has adopted this Fair Disclosure Code.

#### 3. Principles of Fair Disclosure:

A code of practices and procedures for Fair Disclosure of Price Sensitive Information for adhering each of the principles is set out below:

- a. The company shall ensure prompt disclosure of unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- b. The company shall make uniform and universal dissemination of UPSI to avoid selective disclosure. Upon the information being submitted with the Stock Exchanges, the information shall be deemed to be generally available and shall no longer be treated as UPSI.
- c. The Company Secretary has been appointed as the Chief Investor Relation officer for the purpose of aforesaid SEBI Regulation and for handling the dissemination of information and disclosure of UPSI. In the absence of the Company Secretary, such other officer as may be authorized by the Board.
- d. The Company shall promptly disseminate the UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities.
- f. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- g. The Company shall adopt 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.

Details relating to quarterly performance and financial results are disseminated to the shareholders through the press releases and uploaded on the Company's website.

- h. The Company shall handle all UPSI on a need-to-know basis.