

May 14, 2015

To

BSE Ltd Phiroze Jeejeebhoy Towers 21 st Floor, Dalal Street Mumbai 400 001. Through :: BSE Listing Centre	National Stock Exchange of India Ltd Exchange Plaza, 5 th Floor Plot No :: C/1 G Block Bandra – Kurla Complex Bandra (E), Mumbai 400 051 Through : NEAPS
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Dear Sir,

Sub: Code of Conduct and Code of Fair Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015

We confirm that the company has formulated code of conduct as required under Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Further the Company has also formulated and uploaded in its website Code of Fair Disclosure of Unpublished Price Sensitive Information as required under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, a copy of which is enclosed herewith for your records.

Thanking you

Yours truly
For **Aban Offshore Limited**


S. N. Balaji
Senior Manager (Legal) & Secretary
Encl:a/a

ABAN OFFSHORE LIMITED

ABAN OFFSHORE LIMITED'S (AOL) Code of Practices and Procedures for "Fair Disclosure of Unpublished Price Sensitive Information" ("FDUPSI")

Formulated in line with sub-regulation (1) of Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A thereof

(A) This code may be called "AOL CODE FOR FDUPSI"

(B) This code shall come into force from 15th May 2015.

(C) Covenants of the Code are:

1. AOL shall ensure to make prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.

"UPSI" means any information which is likely to materially affect the price of the securities and shall include: financial results; dividends; change in capital structure; mergers, demergers, acquisitions, delistings, disposals and expansion of business and such other transactions; changes in key managerial personnel; and material events in accordance with the Listing Agreement.

'Generally available information' means information that is accessible to the public on a non-discriminatory basis.

2. AOL shall ensure to make uniform and universal dissemination of UPSI to avoid selective disclosure.
3. AOL has designated Sri S. Srinivasan, Senior Vice President (Corporate Planning) as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI
4. AOL shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. AOL shall ensure to make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. AOL shall ensure that information shared with analysts and research personnel is not an UPSI



7. AOL shall develop 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. AOL shall handle all UPSI on a need-to-know basis.

Persons of AOL, who are in possession or access to UPSI shall handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.

