June 17, 2015

National Stock Exchange of India Limited
Exchange Plaza
Plot no. C/1, G Block
Bandra – Kurla Complex
Bandra (E)
Mumbai - 400 051

Symbol: TRIGYN

Dear Sirs,

Sub: Confirmation of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Please find enclosed herewith a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information of the Company published on its official website formulated as required under SEBI circular CIR/ISD/01/2015 dated May 11, 2015 as per the requirements of SEBI (Prohibition of Insider Trading) Regulations, 2015, and approved by the Board of Directors on its meeting held on May 25, 2015.

Kindly take the same on record.

Thanking you.

Yours faithfully,
For Trigyn Technologies Limited

Parthasarathy Iyengar
Company Secretary & Compliance Officer

Encl: as above

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

[Pursuant to sub- regulation (1) of regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

TRIGYN technologies

The Board of Directors of Trigyn Technologies Limited (the "Company") are expected to manage their affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interests of all the stakeholders. The Company has since time immemorial, been committed to transparency and fairness in dealing with all the stakeholders.

Preface:

1. SEBI on 15th January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15th May, 2105.
2. Chapter –IV of SEBI (Prohibition of Insider Trading) Regulations, 2015, Regulation 8, provides for formulation of a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as "Code").
3. The Company endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent the misuse of such information. To achieve these objectives, and in compliance with the aforesaid SEBI regulations, the Company notifies this Code.
4. This Code shall be applicable on all the Board of Directors of the Company with effect from 15th May, 2015.
5. Any subsequent modification and/or amendments brought about by SEBI in the aforesaid regulations shall automatically apply to this Code.

The Principles of Fair Disclosures adopted by Trigyn are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.

2. To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.

3. Trigyn's Chief Financial Officer serves as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.

CERTIFIED TRUE COPY

For Trigyn Technologies Limited

Parthasarathy Iyengar
Company Secretary

5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website www.trigyn.com to ensure official confirmation and documentation of disclosures made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.

Powers of Board of Directors:

The Board of Directors of the Company will be responsible for the implementation of this "Code".

It reserves the right to modify this Code in whole or in part, at any time without assigning any reason what so ever but within the framework of the aforementioned regulations.

Disclosure of the Code in Public Domain:

This Code shall be published on the official website of the Company.

Further, this Code and every subsequent amendment thereto, shall be promptly intimated to the Stock Exchange where the Securities of the Company is listed.

CERTIFIED TRUE COPY

For Trigyn Technologies Limited

Parthasarathy Iyengar
Company Secretary