

15th June 2017

Listing Department,
National Stock Exchange of India Limited,
Plot No C/1, G Block,
Bandra-Kurla Complex,
Bandra (E),
Mumbai - 400051

Department of Corporate Services
BSE Ltd,
Floor 25, Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

Company: VA TECH WABAG LIMITED
Symbol /Scrip Code : WABAG / 533269

Dear Sir/Madam,

Sub: Revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information under SEBI (Prohibition of Insider Trading) Regulation 2015.

Pursuant to Chapter IV of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, please find attached the revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information under SEBI (Prohibition of Insider Trading) Regulation 2015 as approved by the Board of Directors of the Company.

Kindly take note of the above.

Thanking You,

Yours faithfully,
For **VA TECH WABAG LIMITED**



R Swaminathan
Company Secretary

Sustainable solutions, for a better life

VA TECH WABAG LIMITED
CODE OF PRACTICES AND PROCEDURES FOR FAIR
DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

INTRODUCTION

VA TECH WABAG LIMITED ("Company") has formulated CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION policy pursuant to Chapter IV of The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, (hereinafter referred to as the 'Regulation') . The said Regulation mandates Listed Companies to frame a Code for Fair Disclosure of Unpublished Price Sensitive Information.

APPLICABILITY

This Code shall be applicable with effect from May 15, 2015.

OBJECTIVE

It is and shall be the Policy of the Company that it is committed to Ethical & Lawful Business Conduct while dealing with the Unpublished Price Sensitive Information. The objective of the Policy is to comply with fair disclosure of Events and occurrences which affects Company or the price of its Securities.

CODE OF FAIR PRACTISE & DISCLOSURE

1. CHIEF INVESTOR RELATIONS OFFICER

The Company has designated Mr. Parthasarathy Gopalan as its Chief Investor Relations Officer to administer this code and to deal with dissemination of information and disclosure of unpublished price sensitive information who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the code under the overall supervision of the Board of Directors.

2. DISCLOSURE AND DISSEMINATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Information disclosure/dissemination may normally be approved in advance by the official designated for the purpose.

If information is accidentally disclosed without prior approval, the person responsible may inform the designated officer immediately, even if the information is not considered price sensitive.

The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

Price sensitive information shall be given by the Company to Stock Exchanges and disseminated on a continuous and immediate basis.

The Company shall ensure that it follows a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosures

3. RESPONSE TO MARKET RUMOURS

The Company shall not pave a way for dissemination of rumors, information relating to the price sensitive information of the Company which shall affect the price of the securities. If on the happening of any such events, the Company shall have clearly laid down procedures for responding to any queries or requests for verification of market rumors if any raised by the regulatory authorities.

The official designated for corporate disclosure shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumors and then making the disclosure.

4. DISCLOSURE/DISSEMINATION OF PRICE SENSITIVE INFORMATION WITH SPECIAL REFERENCE TO ANALYSTS, RESEARCH PERSONNEL AND INSTITUTIONAL INVESTORS

The Company shall make sure that it acts honestly, diligently and in good faith and integrity in holding unpublished price sensitive information and their dealings with the analysts or research personnel or to any other personnel in their business conduct.

The Company should follow the guidelines given hereunder while dealing with analysts and Institutional investors:-

(i) Investor / Analyst Presentations

The Investor / Analyst presentations shall be uploaded on the website of the Company.

(ii) Concall Transcripts

The transcripts of Investor / Analysts call shall be uploaded on the website of the Company.

(iii) Press Releases

A Copy of the press release intimated to Stock Exchanges shall be uploaded on the website of the Company.

5. MEDIUM OF DISCLOSURE/DISSEMINATION

- (i) Disclosure/dissemination of information may be done through one or more media as may be required, so as to achieve maximum reach and quick dissemination.
- (ii) The Company shall ensure that disclosure to Stock Exchanges is made promptly.
- (iii) The Company may also facilitate disclosure through its website.
- (iv) The information filed by the Company with exchanges under continuous disclosure requirement may be made available on the Company's website.

6. HANDLING OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Company shall ensure that Company's personnel handling unpublished price sensitive information or who have access to unpublished price sensitive information shall not communicate provide or allow access to any such information except where such communication is for legitimate purpose performance of his duties and discharge of legal obligations and shall also handle the same only on need to know basis.

7. DISCLOSURES

This Code and any amendment thereof will be published on the Company's official website (www.wabag.com) and shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed.

Original Code approved on: 25th May 2015
Code revised on: 25th May 2017

.....