



Reliance Nippon Life
Asset Management Limited
(formerly Reliance Capital
Asset Management Limited)

Registered Office :
Reliance Centre, 7th Floor, South Wing,
Off Western Express Highway,
Santacruz (East), Mumbai - 400 055
(CIN : L65910MH1995PLC220793)

Tel : +91 22 3303 1000
Fax: +91 22 3303 7662
www.reliancemutual.com

November 21, 2017

General Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort, Mumbai 400 001
BSE Scrip Code: 540767

Vice President
Listing Department
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot No. C/1,
G Block, Bandra Kurla Complex,
Bandra (East), Mumbai 400 051
NSE Scrip Symbol: RNAM

Dear Sir(s),

Sub.: Intimation under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, please take on records, the Company's Code of Conduct for Fair Disclosure of Unpublished Price Sensitive Information.

The same is also available on our website.

We request you to inform your members accordingly.

Thanking you.

Yours faithfully,
For Reliance Nippon Life Asset Management Limited


Deepak Mukhija
Company Secretary & Compliance Officer



BEST EMPLOYERS

INDIA | 2016

A Reliance Capital Company

RELIANCE NIPPON LIFE ASSET MANAGEMENT LIMITED (“COMPANY”)

CODE OF PRACTICES & PROCEDURES

FOR

FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

EFFECTIVE FROM AUGUST 08, 2017

1. Preamble

Reliance Nippon Life Asset Management Limited (“Company”) is committed to a culture of timely dissemination and promoting timely, fair & appropriate towards ensuring fair & equitable flow of information to its stakeholders. In its communication with investors, it would endeavour to provide a healthy level of disclosure, with responsibility and caution in discussion about the future, transparency and equal dissemination of information to all its investors and analysts, current or prospective. The Company welcomes enhanced sensitivity to equality in shareholder communication and has formalized its principles into a Code of Fair Disclosure.

2. Purpose

The Securities and Exchange Board of India (“SEBI”) has formulated the SEBI Insider Trading Regulations to prescribe a legal framework for prohibition of insider trading. In terms of the provisions of SEBI Insider Regulations, every listed company is required to formulate a Code of Fair Disclosure. Accordingly, the Company has formulated this ‘Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information’ to ensure timely and adequate disclosure of Unpublished Price Sensitive Information.

3. Effectiveness

This Code of Fair Disclosure shall be effective from August 08, 2017.

4. Definitions

Capitalized terms used but not defined herein shall have the same meaning as assigned thereto in the SEBI Insider Regulations, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulations) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder or any other applicable laws or regulations, as the case may be.

"Act" means the Securities Exchange Board of India Act, 1992 (15 of 1992).

“Board” means Board of Directors of the Company.

“Executive Director & CEO” means Chief Executive Officer as defined in Section 2(18) of the Companies Act, 2013 and appointed by the Board of Directors as Executive Director & CEO.

“Chief Financial Officer” means the Chief Financial Officer as defined in section 2(19) of the Companies Act, 2013 and appointed by the Board of Directors as the Chief Financial Officer.

“Code of Fair Disclosure” means this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information formulated by the Company and as amended from time to time.

"Company" means Reliance Nippon Life Asset Management Limited.

"Compliance Officer" means the Company Secretary of the Company or any other senior officer, designated so from time to time and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI Insider Regulations, and 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 codes specified in SEBI Insider Regulations under the overall supervision of the Board of the Company.

"Director" means a member of the Board of Directors of the Company.

"Investor" means analyst, research personnel, securities market professional, individual, institutional investor or potential investor.

"Officer" means officer as defined in Section 2(59) of the Companies Act, 2013.

"SEBI Insider Regulations" shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

"Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.

"Unpublished Price Sensitive Information" means any information, relating to the Company or its Securities, directly or indirectly that is not generally available which upon becoming generally available is likely to materially affect the price of the Securities and shall, ordinarily include but not restricted to, information relating to the following:

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) Mergers, de-mergers acquisitions, de-listings, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel; and
- (vi) material events in accordance with the listing agreement.

5. Prompt public disclosure of Unpublished Price Sensitive Information

The Company will comply with all periodic reporting and disclosure requirements contained in the Companies Act, 2013, listing agreement executed with the stock exchanges, SEBI Insider Regulations and other applicable laws. The Company shall make prompt 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 and shall

disseminate the Unpublished Price Sensitive Information uniformly and universally without any selective disclosure.

6. Persons Responsible for disclosure of Information

The Compliance Officer shall deal with the dissemination and disclosure of Unpublished Price Sensitive Information. In addition to Compliance Officer, the Chief Financial Officer, the Executive Director & CEO or any other person appropriately authorised in this regard, may also communicate with the Investors / media.

7. Prompt disclosure of information that get disclosed inadvertently or selectively

The Company shall also promptly disseminate the Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available by informing to the stock exchanges where the Securities of the Company are listed. If any Unpublished Price Sensitive Information is inadvertently disclosed without the knowledge of the Compliance Officer, the Compliance Officer would be informed by the relevant Officer of the Company about the same as soon as possible and the Compliance Officer shall take such action to ensure that such information is generally available.

8. Appropriate response to queries on news reports

The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities. The Compliance Officer may also decide whether a public announcement is necessary for verifying or denying rumors and in case it is necessary, the Compliance Officer in consultation with Executive Director & CEO or Chief Financial Officer should make a public announcement for either verifying or denying the rumors.

9. Information shared with analyst and research personnel

The Company shall ensure that the information shared with analyst and research personnel is not Unpublished Price Sensitive Information. After issuance of each quarterly financial earning release, the Company may hold a quarterly conference call with Investors and media. The Company will furnish the quarterly earning press release to the stock exchanges where its Securities are listed before the commencement of quarterly conference call. The Company shall make transcripts or record of proceedings of quarterly conference call and also other investor relations conferences and place it on the official website of the Company to ensure official confirmation and documentation of disclosure made.

10. Unpublished Price Sensitive Information on need to know basis

Unpublished Price Sensitive Information shall be handled on a need to know basis, i.e. Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the

information to discharge their duties and shall not be communicated to any person except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.

11. Modification and Amendments

The Company reserves all rights to modify and/or amend this Code of Fair Disclosure at any time. This Code of Fair Disclosure and subsequent amendment(s) thereto, shall be promptly intimated to the stock exchanges where the Securities of the Company are listed.

12. Other requirements

The Company shall ensure the compliance of other applicable provisions of SEBI Insider Regulations in this regard. This Code of Fair Disclosure and amendments thereof shall also be published on the official website of the Company.