

Ref. No.: NCCL/ 2015

Date : 18-05-2015

The Secretary
National Stock Exchange of India Ltd
5th Floor, Exchange Plaza
Bandra - Kurla Complex
Bandra (E)
MUMBAI - 500 051.
Fax No: 022 - 2659 8237 / 38

The Secretary
Bombay Stock Exchange Ltd,
1st Floor, New Trading Ring
Rotunda Building, P J Towers
Dalal Street, Fort
M U M B A I - 400 001.
Fax : 022-22722037/39

Dear Sir(s),

Scrip Code : NSE: NCC & BSE : 500294

Sub: Formulated Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

In compliance with SEBI (Prohibition of Insider Trading) Regulations,2015, the Board of Directors of the Company at their meeting held on 14th May,2015 have approved the following;

- 1) Pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, The Company has formulated NCC Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information("Code") and the same is enclosed for your perusal and record. We also inform you in this connection that NCC code has also been published on the website <http://ncclimited.com> of the Company .
- 2) Pursuant Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has formulated and adopted Code of Conduct for Prevention of Insider Trading for its employees and other connected persons, to regulate, monitor and report trading by the employees and other connected persons.

Kindly acknowledge the receipt.

Thanking you,
Yours faithfully
For NCC LIMITED


M V SRINIVASA MURTHY
COMPANY SECRETARY & EVP (L)

NCC Limited

(Formerly Nagarjuna Construction Company Limited)

CIN: L72200AP1990PLC011146

NCC House, Madhapur, Hyderabad 500 081 T +91 40 2326 8888 F +91 40 2312 5555 ncclimited.com

NCC Code of Practices and Procedures for

Fair Disclosure of Unpublished Price Sensitive Information

(Approved by the Board of Directors in their meeting held on 14th May, 2015)

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by NCC Limited (NCCL). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

The Principles of Fair Disclosure adopted by NCC 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 To promptly make public disclosure of unpublished price sensitive information that would impact price discovery.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. NCCL Company Secretary/EVP(Finance) serves as its Chief Investor Relations Officer(s) 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.
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 <http://ncclimited.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.

