AsahiSongwon

Ref: ASCL/NSE/SEC20/1506/12

June 3, 2015

To,
General Manager (Listing)
National Stock Exchange of India Ltd
5th Floor, Exchange Plaza
Bandra – Kurla Complex
Bandra (East)
Mumbai – 400 051
Fax: 022-26598237/38

Sub: Adoption of Code under Regulation 8 and 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref: COMPANY SYMBOL: ASAHISONG-EQ

Dear Sir/Madam,

In compliance of Regulation 8 of SEBI (Prohibition of Insider Trading) Regulation, 2015, we would like to inform that the Company has formulated the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive information". A copy of the said Code is enclosed herewith.

Further, the Company has also adopted and approved "Code of Conduct to Regulate, Monitor and Report Trading by Insiders", pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulation, 2015.

Kindly take the same on your records.

Thanking you,

Yours faithfully,
For, **ASAHI SONGWON COLORS LIMITED**

GOKUL M. JAYKRISHNA
Joint Managing Director

Encl: As above

AsahiSongwon

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[As envisaged under Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

The Company shall adhere to the following principles in order to ensure timely and adequate disclosure of Price Sensitive Information with respect to it or its securities which is likely to affect price of the securities:

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.

2. The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

3. The Company Secretary will be chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

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 The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

6. The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.

7. The Company will make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.

8. The Company will handle all unpublished price sensitive information on a need-to-know basis.

ASAHI SONGWON COLORS LTD.