AXIS BANK

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

In consonance with the principles of fair disclosure specified in SEBI (Prohibition of Insider Trading Regulations), 2015, (Insider Trading Regulations) the Bank would adhere to following practice and procedure for fair disclosures in respect of unpublished price sensitive information (UPSI) relating to the Bank and/ or its securities

1. Any information that could have a material impact on price of shares/ securities of the Bank shall be promptly disclosed to Stock Exchanges where the shares/ securities of the Bank are listed. Such disclosure would subject to receipt of internal approvals and made through authorised personnel of the Bank, in accordance with applicable corporate and securities laws.

2. Uniform and universal dissemination of UPSI would be ensured by the Bank by adopting a common platform i.e. Stock Exchanges for public disclosure. Once the UPSI is communicated to Stock Exchanges as aforesaid, then other medium of dissemination may also be used to ensure such information is made accessible to the public on a non-discriminatory basis.

3. The Head - Investor Relations of the Bank would be the 'Chief Investor Relations Officer' of the Bank for the purpose of this code and Insider Trading Regulations. He is authorized by the Bank to ensure proper and timely dissemination of information in the ordinary course of the business of the Bank and also to disclose UPSI relating to the Bank and/ or its securities to the investors/ analysts, press, electronic/social media and other concerned members of the public.

4. In the unlikely event of any UPSI being disclosed selectively, inadvertently or otherwise, at any forum whether in India or abroad, the Chief Investor Relations Officer of the Bank, shall take effective steps to promptly disseminate such information to the Stock Exchanges, for public disclosure.

5. The 'Chief Investor Relations Officer' of the Bank is authorized to respond to any queries that may be received from stock exchanges, press, electronic/ social media or investors of the Bank, for verification of any market rumours relating to the Bank and/ or any of its subsidiaries, subject to internal clearances.

6. In case any disclosure of UPSI is inadvertently made at a meeting with analysts or at any investors relation conference, which if made public could materially impact the price of the securities of the Bank on the stock exchange(s), would be promptly communicated to the stock exchanges on which the securities of the Bank are listed, so as to ensure such information is generally available to the public.

7. Any information that may be classified as UPSI would be dealt with by the Directors and Employees of the Bank on 'Need to Know' basis only.

8. This code has been reviewed and approved by the Board of Directors of the Bank at its meeting held on 29th April, 2015. The code shall be applicable and binding on all Directors, Employees and connected persons (as defined in the Code of Conduct to Regulate, Monitor and Report Trading by Insiders) of the Bank and shall be deemed to have come into effect from 15th May 2015.