

Aptech Investor Communication Policy

Aptech Limited is committed to fair disclosure of information to their investors, the financial community and the public. The Policy has been established to ensure proper disclosure of material nonpublic information and to aid our investors, our employees, the financial community, the media and the general public in appraising the Company and its business outlook.

Full disclosure of Material, Nonpublic Information

It is our policy to disclose material, nonpublic information only in a manner that ensures full and complete disclosure through:

- 1) Issuing a press release
- 2) Communication to the Stock exchanges on which the equity shares of the Company are listed.
- 3) Posting the information on the Company's website, www.aptech-worldwide.com
- 4) Posting to each shareholders house, a detailed Annual Report detailing the performance of the Company, financial or otherwise, as also its subsidiaries.
- 5) Apprising the shareholders of business strategies and detailed business outlook at the shareholders meeting at least once in a year, i.e. the Annual General Meeting.
- 6) Using any combination of above or any other methods so designed as to provide full public information.

Authorised Company Spokespersons

Only the Chairman, Managing Director, Chief Financial Officer, Company Secretary, Head – Investor Relations and Senior Vice President / Vice President – Corporate Communications are authorised to communicate with investors, financial analysts or securities market professionals on behalf of Aptech Limited. In certain circumstances, the authorised spokespersons listed above may authorise, in advance, other officers, employees or representatives to communicate with the investors, financial analysts or securities market professionals on behalf of Aptech Limited.

Corporate Communications

In general, media interviews are exempt from this policy and the same will be coordinated through the Corporate Communications department.

One point contact

All inquiries by investors, financial analysts or securities market professionals should be directed to Head (Investor Relations) at (091 – 022 – 2827 2300 / 01 / 28272308).

All inquiries by media should be directed to Manager (Corporate Communications) at (091 – 022 – 28272300 / 01 / 28272468)

Employees

No employee (other than those listed above) shall disclose / communicate any information about Aptech Limited except through:

- 1) Company sanctioned public disclosures
- 2) For business purposes under a non-disclosure agreement.

One-on-One Conversations with Investors, Financial Analysts or Securities Markets Professionals

One-on-One Conversations with Investors, Financial Analysts or Securities Markets Professionals are a very valuable part of our investor relations program. However, we will not disclose material, nonpublic information during such conversations.

Accordingly, during such conversations only following information will be discussed:

- Information already in public domain; and / or
- Generally know company or industry specific information such as historical Company or industry information, generally identifiable trends, company strategy and goals.

Investor Analyst meets / conferences

Aptech Limited shall endeavour to improve investor relations by holding investor - analyst meets / conferences that would encourage the Company's stakeholders to solicit and access the information on Company's progress and performance.

In order to avoid misquoting or misrepresentation, the Company may nominate at least two company representatives to be present at meetings with Analysts or Institutional Investors and discussion should preferably be recorded.

By order of the Board