

LUXOFT HOLDING, INC

FAIR DISCLOSURE POLICY STATEMENT

It is the policy of Luxoft Holding, Inc and its subsidiaries (“**Luxoft**”) to maintain an active and open public dialogue with shareholders, institutional investors, broker/dealers, and sell-side analysts (collectively, “**Securities Market Participants**”). While the Securities and Exchange Commission’s Regulation Fair Disclosure (“**Regulation FD**”) does not apply to Luxoft as a foreign private issuer, Luxoft is committed to the fair disclosure of information consistent with the spirit of Regulation FD. For purposes of this policy, “public disclosure” means filing or furnishing a Form 6-K with the Securities and Exchange Commission (“**SEC**”), or disseminating information through another method (or combination of methods) of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public. Luxoft has established the following guidelines to avoid selective disclosure of material nonpublic information.

COMPLIANCE GUIDELINES FOR THIS REGULATION FD DISCLOSURE POLICY

Directors and employees of Luxoft will not disclose material nonpublic information about Luxoft except in a manner that is consistent with SEC rules and regulations. Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, sell or hold a security. Any information that could reasonably be expected to affect the price of a security is material. Because this is an area that requires specialized judgment, you should contact the General Counsel of Luxoft if you have questions. “Nonpublic” information is information that is not generally known or available to the public. Information is considered publicly available, and thus public, only when it has been publicly released and the investing public has had time to absorb the information fully. As a general rule, Luxoft considers information nonpublic until the close of trading at the end of the second full trading day after the information has been released.

If any employee determines that material nonpublic information has been selectively disclosed, that employee should contact the General Counsel immediately. The General Counsel will determine the appropriate public disclosure that will have to be made in accordance with SEC rules and regulations.

I. PUBLIC POSTING

Luxoft will post this policy statement on its website at www.luxoft.com and update it as necessary to ensure that Securities Market Participants are informed about Luxoft’s disclosure policy.

II. AUTHORIZED REPRESENTATIVES OF COMPANY

- a. Persons authorized to communicate on behalf of Luxoft to Securities Market Participants are limited to the Chief Executive Officer, the Chief Financial Officer

and the Head of Investor Relations. Individual members of the board of directors will not generally communicate with Securities Market Participants.

- b. In addition, the Chief Financial Officer and members of the Chief Financial Officer's staff are authorized to communicate with employee shareholders and beneficial owners in response to inquiries regarding employee shareholder accounts and other administrative matters.
- c. It is Luxoft's policy that, except as specified under (a) and (b) above, employees shall not communicate with Securities Market Participants, and should refer all questions to the Chief Financial Officer.
- d. Luxoft believes that one-on-one communications with Securities Market Participants are a valuable component of its Investor Relations program. Except as otherwise provided in clauses (a) and (b) above, the Chief Financial Officer or a person designated by the Chief Financial Officer shall participate in such communications. During such communications, authorized representatives may discuss information Luxoft has previously publicly disclosed, non-material information, and generally known company or industry-related information. Notwithstanding the foregoing, authorized representatives will not affirm previously-released earnings guidance, if any, or comment on current quarter or annual performance, during such communications.
- e. In order to ensure that complete and accurate information is obtained, Securities Market Participants should be and are instructed to direct all inquiries regarding Luxoft's financial condition, results of operations, strategies and other similar matters, to the Chief Financial Officer. Statements by employees or agents who are not authorized representatives of Luxoft should not be relied upon.

III. QUARTERLY EARNINGS RELEASE CONFERENCE CALLS AND UPDATES

- a. Luxoft will hold quarterly investor conference calls open to the public and media, and provide public notice about the call through a press release, by electronic distribution, posting on at least one well-known public financial information website and the Luxoft website. Before the conference call, Luxoft will furnish its quarterly or annual written earnings release to the SEC on a Form 6-K.
- b. Playback of the conference call will be provided on Luxoft's website after the conference call for 7 days.
- c. When Luxoft provides guidance relative to its financial goals, all guidance, and changes to or affirmations of guidance, will be provided through public disclosure. Any change to guidance practices, including the suspension of current guidance, will be announced in the same manner in which Luxoft provides guidance.

- d. As needed, from time to time, Luxoft will hold investor conference calls open to Securities Markets Participants, and provide public notice about the call through public disclosure.

IV. QUIET PERIOD

Luxoft may decide not to meet with Securities Market Participants for a period of time, normally 14 to 21 days, prior to the end of each fiscal quarter or year until the issuance of the quarterly or year-end earnings release. The object of the quiet period is to minimize the risk of selective disclosure and the spread of any rumors prior to Luxoft's earnings announcement.

V. ANALYST MODELS AND REPORTS

Luxoft may elect to review draft analyst reports, but will not comment on such reports other than to correct inaccuracies relating to public historical information and, in limited circumstances, forward-looking information relating to statements made by Luxoft in Luxoft's quarterly earnings release or publicly disclosed by Luxoft during the quarterly earnings conference call.

VI. PRESENTATIONS

- a. Luxoft will participate in securities firm-sponsored and other investor conferences and provide adequate prior public notice. It will be Luxoft's practice to webcast these presentations if possible. It will be Luxoft's practice to issue media releases in conjunction with Luxoft's major presentations scheduled during the year, and to post those presentations on Luxoft's website. The Chief Financial Officer shall pre-approve Luxoft's participation in these presentations.
- b. Luxoft will participate in other forums at which Securities Market Participants could be present, including industry seminars, trade shows, employee, retiree, annual shareholder meetings, and meetings with commercial partners that are shareholders. Luxoft does not intend to disclose any material nonpublic information during these meetings.
- c. Although Luxoft recognizes that Regulation FD does not apply to communications with the media or to it as a foreign private issuer, it is Luxoft's policy to publicly disclose material information before discussing such material with individuals representing the media.

VII. TELEVISION, RADIO AND ONLINE BROADCASTING APPEARANCES

All requests to conduct business-related television, radio or online broadcasting programs, or to appear as a guest on such programs, must be approved in advance by the Chief Financial Officer. Broadcast activities that are a part of an approved marketing effort do not need to be approved in advance.

VIII. ONLINE CHAT ROOMS, FORUMS AND SOCIAL MEDIA PLATFORMS

Luxoft may monitor what others are saying about Luxoft in online chat rooms, forums and social media platforms however, Luxoft generally will not respond to any business-related rumors or correct any inaccuracies that might appear unless required to do so by law or by regulators.

IX. COMMENTING ON RUMORS

Luxoft has a policy of not responding to business-related rumors absent a legal duty to do so. Whether or not the rumor has any basis in fact, Luxoft normally will respond by saying: “Our policy is not to comment on business-related rumors or speculation.” Like most companies, Luxoft follows this approach consistently in order to avoid providing an implied confirmation or denial in other circumstances. Any exceptions to this policy must be approved by the Chief Financial Officer.

X. USE OF SAFE HARBOR LANGUAGE

Luxoft will use safe harbor language with respect to forward-looking statements about financial performance at the beginning of quarterly conference calls with the investment community and whenever its representatives speak with analysts or investors. Safe harbor language is also incorporated in all Luxoft’s written investor relations documents.

XI. FURTHER INFORMATION ABOUT THIS POLICY

All inquiries regarding the provisions or procedures associated with this policy should be addressed to the General Counsel of Luxoft.

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Adopted: May 12, 2015