

## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

### **(Pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015)**

Munoth Communication Limited (MCL) will adhere to the following to ensure fair disclosure of events and occurrences that will have an impact on price discovery of its securities in the market.

1. MCL will make prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than concrete and credible information comes into being to make such information available to Stock Exchanges, where the securities are listed for wide dissemination. The Unpublished Price Sensitive Information disclosed to the Stock Exchanges will also be updated on the MCL's website and if required also may be supplemented by updating to the print media. MCL will also consider the other modes of public disclosures which can improve the investor access to such information.

2. MCL will disclose uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure

3. MCL's Company Secretary has been designated as the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of unpublished price sensitive information and will report to Managing Director.

CIRO will be responsible

(i) to ensure timely and adequate disclosure of unpublished price sensitive information pursuant to the aforesaid code

(ii) for ensuring that the MCL complies with continuous disclosure requirements,

(iii) overseeing & coordinating disclosure of unpublished price sensitive information to Stock Exchanges, shareholders, analysts, etc

(iv) educating staff on disclosure policies and procedures

All disclosures/dissemination whatsoever of any information, other than disclosures required to be made under any law or under this code on behalf of the MCL will be first shown to the CIRO for approval and the information will be made public or published on behalf of the MCL only if the same is approved by the CIRO. In case of any clarification/ doubt, the same will be consulted with Managing Director for approval.

4. In case of any unpublished Price Sensitive Information get disclosed inadvertently, selectively or otherwise, then such unpublished price sensitive information will be disseminated immediately to make such information generally available in accordance with the code. If any dissemination of information take place without prior approval, out of accidental omission by any Employee or Director of the MCL, such Employee/ Director will forthwith inform the CIRO about such disclosure irrespective of the fact whether such information is Unpublished price Sensitive information or not.

5. The Employees / Directors of the MCL will direct any queries or requests for verification of market rumors received from Stock Exchange or from the press or media or from any other Source to the CIRO. The CIRO will on receipt of request , consult with the Managing Director and respond to the same without any delay. The CIRO will also be responsible in consultation with the Managing Director to decide whether a public announcement is necessary for verifying or denying rumors and making appropriate disclosures. All the queries/ requests received will be documented as far as practicable. No disclosures in response to the queries/ requests will be made by the CIRO unless the Managing Director approves the same.

6. No person, except those authorised by the CIRO, will disclose any information relating to the MCL's securities to analysts/ research personnel and Investors. The Directors, officers and Employees will provide only generally available information to the analysts/ research personnel and investors.

7. The CIRO in order to avoid misquoting or misrepresentation will arrange for making transcripts or recordings of the proceedings of the meeting with analysts and other investor relations conferences on the official website of the MCL to ensure official confirmation and documentation of disclosure made.

8. MCL will ensure that all published price sensitive information is handled on a need-to know basis.