

RADAAN MEDIAWORKS INDIA LIMITED  
CIN:L92111TN1999PLC043163

CODE OF PRACTICE AND PROCEDURE FOR FAIR DISCLOSURE OF  
UNPUBLISHED PRICE SENSITIVE INFORMATION (“Code for Fair Disclosure”)

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This Code for Fair Disclosure has been framed in accordance with Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 to promote the culture of fair disclosure of information with a view to preserve confidentiality of unpublished price sensitive information, prevent misuse of such information while trading in Company’s securities and ensure fairness in dealing with all stakeholders.

Chief Investor Relations Officer (CIRO):

The Company Secretary will act as the Chief Investor Relations Officer, who would be responsible to oversee due compliance of the principles laid down under this Code. In the absence of CIRO for any reason whatsoever, the Chief Financial Officer (CFO) would be responsible for discharging such duties.

Handling of all unpublished price sensitive information on a need-to-know basis

All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Policy for determination of legitimate purposes

The term “legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with Directors, employees, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants or statutory authorities or other entities, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations and not to trade in securities of the Company when in possession of unpublished price sensitive information and for the said purpose the Company shall execute agreement with such insider(s).

Prompt public disclosure of unpublished price sensitive information

The company believes in timely, uniform and adequate disclosure of unpublished price sensitive information that would impact price discovery. All price sensitive information shall be made generally available to the stake holders immediately without delay as per the statutory framework.

Uniform and universal dissemination of unpublished price sensitive information

All the price sensitive information shall be given by the Company to stock exchanges and disseminated on it's website on a continuous and immediate basis. The information will also be publicized in Newspaper(s), wherever deem necessary or in compliance with provisions of applicable statutes.

Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

To ensure authentication of the information to be disclosed to the stakeholders, the said information shall be reviewed by the CIRO and approved by the Managing Director in advance.

However, if any information gets disclosed selectively, inadvertently or otherwise, the matter shall be immediately brought to the knowledge of the CIRO, who shall take necessary steps to make the facts and rectified information generally available and accessible.

Appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities

The CIRO shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours / report appearing in newspaper or otherwise and then decide about making the appropriate disclosures. In case there is a query on news reports and requests for verification of market rumours by Regulatory Authorities, the CIRO / KMPs shall be responsible for giving appropriate response to that.

Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information

The CIRO / KMPs / respective Departmental Heads shall take all necessary measures to ensure that no unpublished price sensitive information is being disclosed to any analysts, research personnel, institutional investors, media and such related associations. Unanticipated questions shall be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding. If there is any doubt whether any particular information is price sensitive, the CIRO should be contacted.

Developing best practices to make transcripts or record of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

Depending upon the domain of conferences and meetings, concerned persons shall be authorised, to make transcripts or record of proceedings of meetings with analysts. Further, the said proceedings shall be disclosed on Company's website, where deems appropriate / necessary.

#### Communication of the Code

All directors, officers and employees of the Company will be advised of this Code and its importance. A copy of this Code will be available on the Company's website.