



# **SHIGAN QUANTUM TECHNOLOGIES LIMITED**

## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

## **DOCUMENT CONTROL**

### **Document Title and Version**

This document, titled as 'Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information' is issued as version 1.1.

### **Revision history**

<b>Sr. No.</b>	<b>Date of preparation / modification</b>	<b>Version</b>	<b>Department Responsible</b>	<b>Approval Authority</b>
1.	16-10-2021	1.0	Legal & Secretarial Department	Board of Directors
2.	25-02-2026	1.1	Legal & Secretarial Department	Board of Directors

### **Custodian and Review Authority**

This Code shall be maintained and updated, by way of additions, deletions, modifications or substitutions, only by the Legal and Secretarial Department.

Any revision to this Code shall be subject to review by the Managing Director(s), and approval by the Board of Directors.

### **Applicability**

This Code applies to Shigan Quantum Technologies Limited.

## **PREFACE**

The Company is committed to upholding the highest standards of transparency and integrity. It ensures that all material information and developments are communicated to stakeholders promptly, systematically, consistently, and reliably, in accordance with applicable laws and regulations.

In compliance with Regulation 8(1) read with Schedule A of the Insider Trading Regulations, the Company has laid down this Code in order to adhere to each of the principles set out in Schedule A thereof. This Code outlines the guiding principles to be followed for such adherence.

## **DEFINITIONS AND INTERPRETATIONS**

- a) 'Board'** means the Board of Directors of the Company.
- b) 'Code' or 'this Code'** means Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information.
- c) 'Company'** means Shigan Quantum Technologies Limited, unless the context otherwise provides.
- d) 'Insider'** means any person who is a connected person or in possession of or having access to unpublished price sensitive information.
- e) 'Insider Trading Regulations'** means the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- f) 'Listing Regulations'** means the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- g) 'SEBI'** means the Securities and Exchange Board of India.
- h) 'Securities'** means equity shares and other listed securities of the Company.

## **PRINCIPLES OF FAIR DISCLOSURE**

The Company shall adhere to each of the below mentioned principles while disclosing Unpublished Price Sensitive Information ('UPSI'):

- (a) Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available;
- (b) Uniform and universal dissemination of UPSI to avoid selective disclosure.
- (c) Designation of a senior officer as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
- (d) Prompt dissemination of UPSI that gets disclosed selectively, inadvertently, or otherwise to make such information generally available.
- (e) Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (f) Ensuring that information shared with analysts and research personnel is not UPSI.
- (g) Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
- (h) Handling of all UPSI on a need-to-know basis.

## **LEGITIMATE PURPOSES**

The Company shall ensure that the handling of all UPSI is on a need-to-know basis, and no UPSI shall be communicated to any person or entity except in furtherance of legitimate purposes, performance of duties, or discharge of legal obligations in relation to the Company.

Any person or entity in receipt of UPSI pursuant to a 'legitimate purpose' shall be considered an 'Insider' for purposes of the Insider Trading Regulations and this Code, and due notice shall be given to such person or entity to maintain the confidentiality of such UPSI in compliance with the Insider Trading Regulations.

For the purpose of this Code, in terms of Regulation 3(2A) of the Insider Trading Regulations, the expression 'legitimate purpose' shall include, but not limited to, the sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of this Code and the Insider Trading Regulations.

### **CHIEF INVESTOR RELATIONS OFFICER**

The Chief Financial Officer of the Company is designated as the 'Chief Investor Relations Officer', ('CIRO'). The CIRO will be responsible for the dissemination of information and disclosure of UPSI relating to the Company, in compliance with applicable laws.

### **FACTORS TO BE CONSIDERED FOR DISCLOSURE OR DISSEMINATION OF UPSI**

The Company shall adhere to the factors outlined below for disclosure or dissemination of UPSI, and the CIRO shall oversee and ensure compliance with such principles:

- The Company shall promptly disclose UPSI affecting price discovery to the stock exchange(s) as soon as it becomes credible and concrete, prior to any media disclosure, and shall simultaneously place the same on the its website;
- During interactions with the investor community, the Company shall ensure that no UPSI is selectively disclosed to any one or group of research analysts or investors to the disadvantage of other stakeholders. In the event of any selective disclosure of UPSI, whether inadvertent or otherwise, such disclosure shall be promptly attended, and the UPSI, along with any necessary clarification, shall be made generally available by promptly disseminating it to the stock exchange(s) where the securities of the Company are listed and simultaneously updating the same on its website.
- All Directors, employees, and any other recipients of information of the Company shall promptly refer any queries or requests for verification of market rumours received from the stock exchange(s), other regulatory authorities, press, media, or any other source to the Chief Investor Relations Officer ('CIRO'). The CIRO, in consultation with the Managing Director(s), shall determine the necessity of making a public announcement to confirm, verify, or deny such rumours and shall ensure that appropriate disclosures are made. All such queries shall be appropriately documented and, where received from the stock exchange(s) or as required under applicable law, shall be clarified to the stock exchange(s) in accordance with the Insider Trading Regulations and the Listing Regulations.

- No UPSI shall be disclosed or disseminated to analysts, institutional investors, selected shareholders, or research personnel. Any information shared with such persons shall be limited to information that is publicly available.
- The transcripts or records of proceedings of meetings with analysts and other investor relations conferences shall be displayed on the website of the Company, as and when required under applicable law, to ensure official confirmation and documentation of disclosures made.
- No UPSI shall be communicated to any person except in furtherance of legitimate purposes, in the performance of duties, or for the discharge of legal obligations.

### **DISCLOSURE**

This Code shall be hosted on the website of the Company for accessibility to its stakeholders and a reference to, or web-link of, this Code, may be disclosed in reports, as required by law from time to time. Further, this Code and any subsequent amendments thereto shall also be promptly intimated to the stock exchange(s) where the securities of the Company are listed.

### **INTERPRETATION OR MODIFICATION**

The Board shall have authority to amend or modify this Code to align with any amendments made to the Listing Regulations, Insider Trading Regulations or such other circulars, or regulations issued by the SEBI, stock exchange(s) or any other authority, or as and when deemed fit by the Board.

In the event of inconsistency between this Code and any statutory provisions, the relevant provisions of the applicable law shall prevail upon the provisions of this Code.