FAIR INTERMEDIATE INVESTMENT PRIVATE LIMITED

Policy for Prevention of Unauthenticated News Circulation

1. Introduction and Objective

This policy is established by Fair Intermediate Investment Pvt. Ltd. pursuant to **SEBI Circular Cir/ISD/1/2011 dated March 23, 2011**, and subsequent addendums. The primary objective is to prevent the circulation of unauthenticated news or rumors by employees that could impact the integrity of the securities market or specific scrips.

2. Scope and Applicability

This policy applies to all employees, temporary staff, and contractual workers of the company. It covers all communication channels, including but not limited to:

- Official and personal email accounts.
- Blogs, chat forums, and social media platforms.
- Instant messaging apps and internal communication tools.

3. Compliance Committee

The Company has formed a dedicated committee to oversee the authentication of information. The committee includes:

- Mrs. Mansi Naghrath (Compliance officer)
- Mr. Amit Agarwal (IT Manager)
- Mr. Kuldeep Trivedi (DP Head)

4. Internal Control and Restricted Activities

- **Prohibition of Rumors:** No employee shall share or forward unauthenticated news that may have a detrimental effect on a scrip or security.
- **Mandatory Approval:** Any news or information related to the market must be approved in **written form** by the Committee before being circulated. Oral or indicative approvals are strictly prohibited.
- **Access Restrictions:** Access to unauthorized blogs, chat forums, and messenger sites will be restricted by the IT department under the supervision of the Committee.

5. Log Maintenance

The IT manager must ensure that logs of all official communications are systematically maintained. These logs are periodically reviewed by the compliance officer to ensure that no unauthorized market-sensitive information is being shared.

6. Training and Awareness

All employees are required to:

- Adhere to the company's internal code of conduct.
- Attend regular training programs and departmental briefings to prevent market rumors.
- Adhere to the checkpoints of the internal control policy.

7. Penalties for Non-Compliance

Any failure by any responsible person to adhere to these guidelines will result in:

- **Internal Action:** Disciplinary action by Fair Intermediate Investments Private Limited.
- **Statutory Action:** This will constitute a violation of the SEBI Act/Rules/Regulations, making the person liable for action by regulatory authorities.
- **Joint Liability:** Committee members and the Compliance Officer may also be held liable for any breach of duty or negligence in oversight.

Effective Date: 04th Nov 2025

For Fair Intermediate Investment Pvt. Ltd.

(Authorized Signatory)