

Date: November 21, 2025

To BSE Limited Listing Department Phiroze JeeJeebhoy Towers, Dalal Street Fort, Mumbai -400001 To,
National Stock Exchange of India Limited
Listing Department
Exchange Plaza, Bandra Kurla Complex
Bandra (East), Mumbai -4000051

Scrip Code: 544614 Symbol: CAPILLARY

Dear Sir/Madam

# <u>Subject: Intimation under Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.</u>

Pursuant to Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations"), please find enclosed herewith the code of practices and procedures for fair disclosure of unpublished price sensitive information framed under Regulation 8(1) of the SEBI PIT Regulations.

The code of practices and procedures for fair disclosure is also available on the website of the Company at <a href="https://www.capillarytech.com/wp-content/uploads/2025/11/Insider-Trading-Prohibition-Code\_Updated.pdf">https://www.capillarytech.com/wp-content/uploads/2025/11/Insider-Trading-Prohibition-Code\_Updated.pdf</a>

This is for your information and records.

Yours Faithfully,

For Capillary Technologies India Limited

Gireddy Bhargavi Reddy Company Secretary and Compliance officer Membership No. 17091

Encl: a/a





#### FAIR DISCLOSURE CODE

### 1. BACKGROUND

In order to adhere to each of the principles of public disclosure of unpublished price sensitive information that would impact price discovery, prompt dissemination of unpublished price sensitive information, a code of practices and procedures for fair disclosure of unpublished price sensitive information (hereinafter referred to as the "Fair Disclosure Code") is being implemented.

### 2. PRINCIPLES OF FAIR DISCLOSURE AND CONDUCT

- 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;
- Uniform and universal dissemination of UPSI information to avoid selective disclosure;
- Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
- Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities;
- Ensuring that information shared with analysts and research personnel is not UPSI;
- 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;
- Handling of all UPSI on a need-to-know basis.

# 3. CHIEF INVESTOR RELATIONS OFFICER ("CIRO") AND OTHER SPOKESPERSONS

- The CIRO will deal with the dissemination and disclosure of UPSI. The Company Secretary will presently act as CIRO until unless Board authorises otherwise. In addition to CIRO, the following persons ("Authorised Spokespersons") are also authorised to communicate with the investors, research analysts and representatives of the Mmedia, in co-ordination with the CIRO:
- a) Chairman, managing director, chief executive officer and chief financial officer
- b) Employees of investor relations team (senior manager level & above)
- For any specific event or occasion, one or more Company officials may be authorised by the Company to interact with investors, research analysts and representatives of the media.



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• The company secretary shall disseminate / disclose the information to the Stock Exchanges where the Securities of the Company are listed.

#### 4. POLICY FOR DETERMINATION OF "LEGITIMATE PURPOSE"

- In terms of the SEBI Regulations, the term "legitimate purpose" is clarified to include sharing of UPSI in the ordinary course of business by an insider with Company's partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing of UPSI has not been carried out to evade or circumvent the prohibitions of the SEBI Regulations;
- The SEBI Regulations require the Board to formulate a policy for determination of "Legitimate Purpose", in line with the guidance provided in the SEBI Regulations. The assessment of whether sharing of UPSI for a particular instance would tantamount to "Legitimate Purpose" would entirely depend on the specific facts and circumstances of each case. Accordingly, this Policy only sets out the principles that should be considered while assessing if the purpose for which UPSI is proposed to be shared is "legitimate";
- Primarily, the following factors should be considered:
  - whether sharing of such information is in the ordinary course of business of the Company;
  - whether information is sought to be shared to evade or circumvent the prohibitions of the regulations;
  - whether sharing the information is in the best interests of the Company or in furtherance of due diligence for a genuine commercial transaction;
  - whether the information is required to be shared for enabling the Company to discharge its legal/regulatory obligations;
  - whether the nature of information being shared is commensurate to the purpose for which access if sought to be provided to the recipient.
- It is clarified that in the event there exist multiple purposes for sharing UPSI, each purpose shall be evaluated on its own merits, in line with the aforementioned principles;
- The recipient of UPSI shall be informed, by way of written intimation and/ or contractual agreement, about the confidentiality of such information.

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