

October 16, 2025

To,  
The Listing Department  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400001

To,  
The Listing Department  
National Stock Exchange of India Ltd.,  
Exchange Plaza,  
Bandra Kurla Complex, Bandra (East),  
Mumbai – 400051

Dear Sir / Madam,

**Sub.: Intimation pursuant to Regulations 8 (1) and 8 (2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**

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(“SEBI PIT Regulations”), please find enclosed herewith the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information framed under Regulation 8 (1) of the SEBI PIT Regulations.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 <https://www.canararobeco.com/>.

This is for your information and records.

Yours faithfully,  
**For Canara Robeco Asset Management Company Limited**

**Ashutosh Pramod Vaidya**  
**Company Secretary & Compliance Officer**  
**Membership No.: A14242**

**CANARA ROBECO ASSET MANAGEMENT COMPANY LIMITED**

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE  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

<b>Date of Adoption</b>	July 17, 2025
<b>Effective Date</b>	From the date of listing of equity shares of the Company on the Stock Exchanges
<b>Review Date</b>	-
<b>Version</b>	V.1

## I. INTRODUCTION

1. Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**”) requires the board of directors (“**Board**”) of every listed company to formulate a code of practices and procedures for fair disclosure of unpublished price sensitive information (“**UPSI**”) in accordance with the principles provided in Schedule A of the PIT Regulations and maintain minimum standards set out in the PIT Regulations. In pursuance of the same, this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“**Code**”) has been adopted by Canara Robeco Asset Management Company Limited (the “**Company**” or “**CRAMC**”) to lay down procedures to ensure fair and prompt disclosure of UPSI and determine the ‘legitimate purposes’ towards which UPSI may be communicated while ensuring adherence to Applicable Laws.
2. The purpose of this Code is to identify the legitimate purposes towards which UPSI may be shared by an insider, both within and beyond the Company, and specify the processes that shall be followed by the Company to ensure that UPSI is disseminated in a fair, accurate and prompt manner to avoid selective disclosure. This Code must be read alongside the Company’s Code of Conduct for Prevention of Insider Trading in the Shares of Canara Robeco Asset Management Company Limited (hereinafter referred to as “**Code for Prevention of Insider Trading**”).
3. This Code has been approved and adopted by the Board of CRAMC in its meeting dated July 17, 2025 and shall be effective from the date of listing of equity shares of the Company and as may be amended from time to time by the Company.
4. If any of the requirements set out in this Code are inconsistent with the Applicable Laws, the provisions of the Applicable Laws shall prevail over this Code to that extent, and this Code shall be deemed to have been amended to be read in consonance with Applicable Laws.

## II. DEFINITIONS

5. The terms used in this Code shall have the same meaning as assigned to them under the Company’s Code for Prevention of Insider Trading. Any words and phrases used herein, not specifically defined herein or in the Code for Prevention of Insider Trading, shall have the meaning assigned to them under the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the SEBI (Prohibition of Insider Trading) Regulations, 2015, or any rules, circulars or guidelines issued thereunder.

## III. IMPLEMENTATION OF THIS CODE

6. Mr. Ashutosh Vaidya of CRAMC has been appointed as the Compliance Officer under the Company’s Code for Prevention of Insider Trading, to monitor the implementation of the code under the overall supervision of the Board of the Company. Mr. Rupesh Jadhav, Assistant Vice President, Secretarial & Legal is designated as the Chief Investor Relations Officer for the purpose of overseeing and coordinating disclosure of UPSI under this Code. The Compliance Officer and the Chief Investor Relations Officer shall be assisted by members of the Secretarial Department & Corporate Development Department in carrying out the responsibilities under this Code.

## IV. DETERMINATION OF A LEGITIMATE PURPOSE

7. Access to confidential and price-sensitive information about the Company should be limited and handled strictly on a 'need to know' basis. While the definition of UPSI has been set out in the Company's Code for Prevention of Insider Trading and whether an information is UPSI shall be determined in accordance with the Company's Code for Prevention of Insider Trading and PIT Regulations, illustrations of UPSI may include, but are not limited to: information pertaining to the Company's business, earnings, prospects, or any non-routine event, such as new products, change in management, significant litigation, etc. As a rule, in case of doubt over whether a particular piece of information constitutes UPSI, one must err on the side of caution and assume that it is UPSI and act accordingly. If employees have any questions as to whether certain information should be considered UPSI, they should consult the Compliance Department for necessary clarifications.
8. UPSI should only be shared with individuals on a need to know basis, whether within or outside the Company, for performance of their duties, or towards the fulfilment of any legal obligations or for legitimate purposes (as detailed in paragraph 10 below), provided that such sharing has not been carried out to evade or circumvent the PIT Regulations.
9. Any person who receives UPSI for a legitimate purpose shall be considered an 'insider' and due notice shall be given to such persons to maintain confidentiality of UPSI and apprise them of the responsibilities attached with the receipt of such information. To the extent necessary, the restrictions specified in the Company's Code for Prevention of Insider Trading shall become applicable, and the insider shall also abide by the guidelines prescribed towards proper handling of UPSI. If UPSI is shared with external individuals or parties, confidentiality or non-disclosure agreements will be executed, in such format as may be prescribed by the Company
10. An illustrative list of legitimate purposes, in furtherance of which UPSI may be shared, is provided below:
  - 10.1. Performance of duties or carrying out any tasks in the ordinary course of employment;
  - 10.2. Discharge of legal obligation (including for the purpose of obtaining regulatory licenses and approvals), or under directions issued by a court of law or a statutory or regulatory authority;
  - 10.3. Sharing of information with consultants or advisors that is relevant to the subject matter of the assignment, project or transaction;
  - 10.4. Sharing of information with intermediaries and professionals, viz. merchant bankers, legal advisors, auditors, accountants, insolvency professionals, etc., in order to avail professional services or assistance;
  - 10.5. Sharing of information with promoters/ promoter group members, potential collaborators, partners, vendors, lenders, investors, etc., on a need to know basis subject to the execution of confidentiality agreements and undertakings to not transact in CRAMC's securities on the basis of the UPSI (other than as may be permitted in terms of the Company's Code for Prevention of Insider Trading);
  - 10.6. For any other legitimate purpose, as may be determined by the Compliance Officer, from time to time.

11. The Compliance Officer shall maintain record of the details of the recipients in the SDD maintained by the Company in the manner prescribed under the Company's Code for Prohibition of Insider Trading. Such details from the recipients of UPSI shall include their PAN, or any other identifier authorized by law in case where PAN is not applicable, Address etc. of UPSI on Legitimate Purpose, including the following:

- 11.1. Whether the concerned UPSI is required to be shared?
- 11.2. Why is the information required by the recipient?
- 11.3. Who had shared the UPSI and whether he was authorised to do so?
- 11.4. Whether the Compliance Officer was intimated before such sharing of UPSI?
- 11.5. Whether non-disclosure agreements were signed?
- 11.6. Whether notice to maintain confidentiality of the shared UPSI has been given?

Such record shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

Such record shall be preserved for a period of not less than eight years after completion of the relevant transaction and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information shall be preserved till the completion of such proceedings.

#### **IV. PRINCIPLES OF FAIR DISCLOSURE**

12. The Company and all its employees shall adhere to the following principles to ensure fair and prompt disclosure of UPSI:
  - 11.1. 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.
  - 11.2. Uniform and universal dissemination of UPSI to avoid selective disclosure.
  - 11.3. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
  - 11.4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities in compliance with provisions of PIT Regulations and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time.
  - 11.5. Ensuring that information shared with analysts and research personnel is not UPSI.
  - 11.6. 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.
  - 11.7. Handling of all UPSI on a need-to-know basis.

#### **V. COMMUNICATIONS WITH ANALYSTS, INVESTORS AND MEDIA**

13. All interactions with analysts, institutional shareholders, fund managers, creditors and the media shall only be conducted by persons authorised to speak on behalf of the Company, which

shall include the Chief Executive Officer and Managing Director (“CEO & MD”), the Chief Financial Officer (“CFO”) and members of the Investor Relations Department. The CEO & MD and/or the CFO may also authorise other employees to speak on behalf of the Company, from time to time. Such authorisation shall be given in writing, as far as practicable, and the Compliance Officer shall maintain a list of such employees, along with the date of expiry of the authorization, if any.

14. Any discussions with the aforementioned persons shall be based on generally available information that is accessible to the public. The designated spokespersons should not discuss any matter that may be considered as UPSI. Forward-looking statements or projections, should generally be avoided. If any such statements are made, the content therein shall be restricted to publicly available information and data. Upon the conclusion of all analyst calls, investor meets and earnings calls, by whatever name called, the transcripts and recordings of such calls shall be maintained and uploaded on CRAMC’s website and disclosed to exchanges, to the extent required under Applicable Law.
15. The designated spokespersons should refrain from answering any questions, or confirming / denying any statements, posed during such discussions, that may lead to the disclosure of UPSI. Any unanticipated questions should be reserved for a written response later.
16. Any requests for information, comments or interviews addressed to any employee, other than the designated spokespersons and members of the Investor Relations Department, shall be directed to the Compliance Officer. The Compliance Officer shall vet and approve the responses in accordance with this Code. No attempts should be made to handle these inquiries without prior authorization from the Compliance Officer, a designated spokesperson, the CEO & MD and/or the CFO, unless instructed otherwise.
17. Analysts reports, if forwarded to the Company for feedback, shall only be reviewed after receiving express approval from the Compliance Officer. The review of analyst reports shall only be to the extent of correcting statements or figures based on publicly available data, historical or factual information, or any mathematical errors.
18. Press releases should only be issued after review and approval by the Compliance Officer, the CEO & MD, CFO or any designated spokesperson. Press releases or any other communication to the media shall only be released through official communication channels.

## **VI. MARKET RUMOURS**

19. The Company shall not comment, affirmatively or negatively, on any market rumours. However, if the Compliance Officer finds it appropriate to clarify or deny a market rumour, in consultation with the CEO & MD and/or the CFO, the Company, on its initiative may issue a clarification in respect of any market rumours to the exchange. If a query or request for clarification is received from an exchange in relation to a market rumour, the Compliance Officer shall decide on further steps, after obtaining necessary clarifications from the concerned department heads.

## **VII. PROCEDURE IN CASE OF INADVERTENT DISCLOSURE OF UPSI**

20. In case of inadvertent disclosure of UPSI by a designated spokesperson, or any other employee, the concerned individual should immediately notify the Compliance Officer. If the Compliance

Officer is of the opinion that the information constitutes UPI and it has, in fact, been selectively disclosed, the information should be promptly disclosed to the Public through intimation to the Stock Exchanges.

## **IX. REVIEW AND DISCLOSURE**

21. This Code shall be reviewed on an annual basis, or at such frequency as the Board of the Company deems fit. This Code and any amendments, thereof, shall be published on the Company's website and shall be promptly intimated to the stock exchanges where the securities of the Company are listed.

## **X. LIMITATION AND AMENDMENTS**

22. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Code, such amendment(s), clarification(s), circular(s) etc. shall prevail upon the relevant provisions of this Code and this Code shall stand amended accordingly from the effective date of such amendment(s), clarification(s), circular(s) etc.