

November 11, 2025

To: Listing Compliance BSE Limited, 25 th floor, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai 400023 Stock Code: 544117	To: Listing Compliance National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No. C/1, 'G' Block, Bandra- Kurla Complex, Bandra East, Mumbai 400 051 Stock Code: SIGNPOST
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Dear Sir/Madam,

Sub.: Intimation under Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 - Amended Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Pursuant to the provisions of Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"), we wish to inform you that based on the recommendation of the Audit Committee, the Board of Directors of the Company at its meeting held today i.e. November 11, 2025 have amended the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" ("Code of Fair Disclosure") and the same is enclosed herewith.

The Code of Fair Disclosure is also being uploaded on the website of the Company at: www.signpostindia.com.

Kindly take the same on record.

Thanking you,

Yours Sincerely,
For **Signpost India Limited**

Jenny Shah
Company Secretary & Compliance Officer

Encl: as above



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. In consonance with the principles of fair disclosure specified in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, Signpost India Limited has adopted this “Code for Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information”, in respect of fair disclosure of Unpublished Price Sensitive Information relating to the Company and / or its securities.

2. Definitions

For the purpose of this code the following terms shall have the meanings assigned to them hereunder:

- i. “Code” or “this Code” shall mean this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information;
- ii. “Company” or “the Company” or “Signpost” means Signpost India Limited;
- iii. “Generally Available Information” means information that is accessible to the public on a non-discriminatory basis, such as information published on the website of the stock exchanges and shall not include unverified event or information reported in print or electronic media. “Generally Available” with respect to information shall be construed accordingly;
- iv. “Insider” means any person who is: (a) a connected person; or (b) in possession of or having access to Unpublished Price Sensitive Information;
- v. “SEBI Listing Regulations” means the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time;
- vi. “Prohibition of Insider Trading Regulations” means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- vii. “Unpublished Price Sensitive Information” or “UPSI” means any information, relating to the Company or its securities as stated in the Prohibition of Insider Trading Regulations as amended from time to time;
- viii. Other terms not specifically defined here shall have the same meaning as assigned under the ‘Code of Conduct for Prohibition of Insider Trading in securities of Signpost India Limited’ and ‘Prohibition of Insider Trading Regulations’



The provisions of this Code have to be read along with the Prohibition of Insider Trading Regulations and if there is any inconsistency / contradiction between the two, the provisions of the Prohibition of Insider Trading Regulations shall prevail.

3. Purpose of the Code

This Code has been formulated to ensure prompt, timely and adequate disclosure of UPSI.

4. Principles of Fair Disclosure

The Company shall ensure:

- i. 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.
- ii. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- iii. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- iv. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- v. Information shared with analysts and research personnel is not UPSI.
- vi. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website of the Company to ensure official confirmation and documentation of disclosures made.
- vii. Handling of all UPSI on a need-to-know basis.

5. Overseeing and co-ordinating disclosure

- i. The Company Secretary would be responsible to ensure timely, adequate, uniform and universal dissemination and disclosure of UPSI pursuant to this Code as required under the Prohibition of Insider Trading Regulations so as to avoid selective disclosure.
- ii. The Company Secretary shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of UPSI to Stock Exchange(s) where Signpost Securities are listed, analysts, shareholders and media, and educating employees on disclosure policies and procedure.
- iii. Disclosure/dissemination of UPSI may normally be approved in advance by the Company Secretary. In case of doubt, the Company Secretary shall consult and seek approval of the Managing Director / Executive Director(s) / the Chief Financial Officer of the Company, before dissemination of such information.



- iv. If UPSI is accidentally disclosed without prior approval of the Company Secretary, the person responsible shall inform the Company Secretary immediately. The Company Secretary will then promptly disseminate the information so as to make such information generally available.

6. Responding to Market Rumours

The Company Secretary shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure, if required. He/She may consult the Managing Director or Executive Director(s) or the Chief Financial Officer of the Company pursuant to the SEBI Listing Regulations in this regard and thereafter make appropriate disclosures.

7. Disclosure / dissemination of Price Sensitive Information with special reference to Analysts, Research Personnel and Institutional Investors

All Directors and Employees of the Company should follow the guidelines given hereunder while dealing with analysts, research personnel and institutional investors:

i. Only Public information to be provided

The Company shall provide only public information to the analyst/research personnel/large investors like institutions. The Company shall ensure that information shared with them is not UPSI. The information given to the analysts should be made public at the earliest.

ii. Recording of discussion and Simultaneous release of Information

In order to avoid misquoting or misrepresentation, it is desirable that at least two Company representatives be present at meetings with analysts, brokers or institutional investors and discussions should preferably be recorded.

When a Company organises meetings with analysts and other investor relations conferences, the Company will ensure that the transcripts or records of proceedings of meetings with analysts and other investor relations conferences are posted on the official website of the Company, to ensure official confirmation and documentation of disclosures made.



iii. Handling of unanticipated questions

The Company should be careful when dealing with Analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions may be noted and a considered response given later. If the answer includes price sensitive information, then it should be made generally available before responding.

8. Medium of disclosure/dissemination

- i. The Company shall ensure that disclosure to Stock Exchange(s) where Signpost's Securities are listed is made promptly.
- ii. Disclosure/dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.
- iii. The Company may also facilitate disclosure through the use of its official website.
- iv. The information filed by the Company with exchanges under continuous disclosure requirement may be made available on the Company website.

9. Policy for determination of "Legitimate Purpose"

The Policy for determination of "Legitimate Purpose" is annexed and forms part of this Code.

10. The Company will also promptly intimate any amendment to this Code to the Stock Exchanges(s) where Signpost Securities are listed, as required under the Prohibition of Insider Trading Regulations. Any amendment(s) in the statutory/regulatory requirements shall be binding even if not incorporated in this Code.

11. This Code shall be applicable and binding on all Directors, Employees and Connected Persons of the Company.

12. This Code shall be published on the Official Website of the Company www.signpostindia.com.



Annexure

Policy for Determination of “Legitimate Purpose”

The Policy forms part of “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information”. This Policy shall be strictly adhered to by every Insider of the Company.

1. Communication of UPSI pursuant to Legitimate Purpose

“Legitimate Purpose” shall include sharing of UPSI in the ordinary course of business, on a need-to-know basis, by an Insider with:

- (i) Designated Persons;
- (ii) Partners;
- (iii) Collaborators;
- (iv) Lenders;
- (v) Customers;
- (vi) Suppliers;
- (vii) Merchant bankers;
- (viii) Legal advisors;
- (ix) Auditors;
- (x) Insolvency professionals;
- (xi) Other advisors or consultants;
- (xii) Credit rating agencies;
- (xiii) Bankers;
- (xiv) Such other person as may be decided by the Compliance Officer from time to time;

Provided that such sharing has not been carried out to evade or circumvent the prohibition of the Prohibition of Insider Trading Regulations.

To illustrate, procuring / sharing of information in the ordinary course of business for the purpose of consolidation of accounts would be considered as Legitimate Purpose.



2. Conditions for sharing of UPSI

Any person in receipt of UPSI pursuant to a “Legitimate Purpose” shall be considered an “Insider” for purpose of this Code and due notice shall be given to such persons which would *inter alia* include the following:

- i. The information shared is in the nature of UPSI.
- ii. To maintain confidentiality of such UPSI and not to disclose such UPSI except in compliance with Prohibition of Insider Trading Regulations.
- iii. Not to trade in securities of the Company while in possession of UPSI.
- iv. The recipient shall obtain prior written consent of the Company Secretary's in case the information provided to such recipient is to be used by such recipient for a purpose other than the Legitimate Purpose for which the Company had provided the UPSI and such other purpose is also a Legitimate Purpose.

3. Trading when in possession of UPSI

When a person who has traded in securities has been in possession of UPSI, his trade(s) would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

4. Maintenance of Digital Database

The Company shall maintain a structured digital database of the persons with whom UPSI is shared, as required under the Prohibition of Insider Trading Regulations. The database shall contain nature of UPSI and the names of such persons who have shared the information and also the names of such persons with whom information is shared along with the Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available. Such database 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.

5. Penalties and Fines applicable in case of violation of the Policy

Any sharing of UPSI, other than in compliance with the Policy and the Prohibition of Insider Trading Regulations, would be construed as a violation. The onus lies on the insider to prove to the contrary.

In case of any violation of this Policy, disciplinary action would be taken by the Company. The Company shall also inform SEBI about the violation.

6. Policy Adherence Responsibility

The responsibility for adherence to this Policy vests entirely with the person who is sharing the UPSI as well as the recipient of the UPSI.

