

Indegene Policy On Interaction With Investors / Analysts and Silent Period

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Table of Content

1.	Background	3
2.	Objective	3
3.	Responsibility	3
4.	Compliance Requirement	4
5.	Silent Period	4
6.	Annexure Z: Revision History	5
a.	Document Approval Information.....	5
b.	Revision Summary.....	5

1. Background

At Indegene, we are committed to providing timely, adequate, uniform, and universal disclosure of unpublished price-sensitive information (UPSI) to the investor community, enabling them to make informed investment decisions regarding the Company's securities.

In compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 (SEBI PIT Regulations), the Company has adopted the Code of Conduct Policy for Prevention of Insider Trading and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information effective December 9, 2022 ("**CoCFD**").

2. Objective

This Indegene Policy on Interaction with Investors / Analysts and Silent Period ("**Policy**") outlines the process supporting the CoCFD with respect to meetings with analysts, institutional investors, and corporate researchers (Investors & Analysts), intended to prevent unintended leakage of UPSI, selective disclosure, or the appearance of providing insider information to select investors and analysts. It should be read in conjunction with the CoCFD.

"Silent Period" is a specified duration preceding the public announcement of the Company's Unpublished Price Sensitive Information (UPSI) as per SEBI (Prohibition of Insider Trading) Regulations 2015 during which the Company restricts its communication with Investors & Analysts to prevent the inadvertent disclosure of the said information.

3. Responsibility

The Board of Directors have appointed:

- The Company Secretary as the Compliance Officer under the Code of Conduct Policy for Prevention of Insider Trading and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.
- The Company Secretary as the Chief Investor Relations Officer (CIRO) under this Policy.

Only the following representatives ("Participants") are authorized to meet or speak with investors and analysts:

- MD/CEO
- CFO
- Company Secretary/Compliance Officer/CIRO
- Head Investor Relations Officer
- Any other employee or person(s) determined by the CIRO

4. Compliance Requirement

The Company must:

- Maintain the confidentiality of UPSI and disclose it strictly on a need-to-know basis.
- Promptly disclose UPSI that could affect the market price of shares, in compliance with Regulation 30 of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015.
- Ensure uniform and universal dissemination of UPSI, preventing any form of selective disclosure.
- Provide accurate and fair responses to regulatory authorities regarding clarifications on market rumors or news reports.

Regarding meetings with Investors & Analysts, Participants must ensure that:

- No Unpublished Price Sensitive Information (UPSI) is shared with investors and analysts.
- Only authorized representatives shall engage with investors and analysts.
- Notify the Company Secretary/CIRO in advance of any meetings to facilitate required disclosures to Stock Exchanges as per the statutory requirement.
- Notify the Company Secretary/CIRO with Information (name of the Investors & Analysts, date of meeting and venue / mode of the meeting) about the meetings with individual Analysts / investors to facilitate required disclosures to Stock Exchanges as per the statutory requirement.
- Promptly necessary steps to publish details of earnings call meetings with groups of investors and analysts on the Company's website, including transcripts, presentations, and recordings.

5. Silent Period

To avoid unintended leakage of UPSI and selective disclosure the Company will follow a Silent Period before announcing financial results/material information.

1. Regular Silent Period for Financial Results

- The Silent Period shall commence **from the end of the quarter/ financial year**.
- The Silent Period **shall continue until the financial results for that quarter/period are made publicly** available by the company through a Stock Exchange intimation.

2. Restrictions During Silent Period

- During the Silent Period, the company will not ordinarily initiate any meetings, emails, or telephone contact with investors and analysts.
- However, the company may respond to unsolicited inquiries concerning factual matters, clarification on previously shared data, historical data already available in the public domain, or understanding the overall business of the company.

3. Scope of Silent Period

- The Silent Period includes but is not limited to corresponding with investors over emails, attendance at investor conferences, group meetings, and one-on-one meetings.

- It does not include social gatherings.

4. Participation in Investment Meetings or Conferences

- If invited to participate in investment meetings or conferences organized by others during the Silent Period, the CIRO shall determine on a case-by-case basis whether to accept these invitations and the names of the participants.
- Participants attending these conferences must refrain from sharing any UPSI.

5. Interacting During Silent Period

- While a regular Silent Period for financial results is ongoing, the company may choose to interact with investors and analysts if a material event has taken place, provided that such material event is publicly known or informed publicly by the company.

6. Annexure Z: Revision History

a. Document Approval Information

Document Owner		Legal	
Author(s) Name & Designation(s)	31 st July 2024	Karthik Kannappan- Vice President -Legal	Reviewed and approved at the meeting of the Audit Committee held on 31 st July 2024
Reviewer(s) Name & Designation(s)	31 st July 2024	Suhas Prabhu- CFO	
Approver Name & Designation(s)	31 st July 2024	Board Of Directors	
Final Reviewer Name & Designation(s)	31 st July 2024	Sitara Jagadeesha- Senior Associate - Business Process	

b. Revision Summary

Ver. No.	Ver. Date	Revised By	Description	Filename
1.0	31 st July 2024	Karthik Kannappan	This is a baseline version	Silent Period Policy V1.0