



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FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE  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

**KFin Technologies Limited**

**SIGNATORIES**

Version	Prepared by	Reviewed by	Confirmed by	Approved by
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2.0	<b>Ms. Anusha Rao</b> PIT Compliance	<b>Mr. Anish Kumar,</b> Chief Compliance Officer	Audit Committee	Board of Directors

**VERSION CONTROL**

Version	Date	Description	Description of Changes
1.0	June 24, 2021	Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information	New Policy
2.0	April 08, 2026	Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information	Updation in line with the Amendment Regulations dated March 12, 2025

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## 1. INTRODUCTION

- 1.1 The SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”) mandates every listed company to put in place a Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information (“UPSI”) which would be followed by the Company for disclosure of UPSI. The PIT Regulations further require that the code should be based on the principles prescribed in Schedule A of the PIT Regulations, without diluting the provisions contained in the PIT Regulations.
- 1.2 In the above context, KFin Technologies Limited (“**Company**”) has formulated this Code of Practices and Procedures for Fair Disclosure of UPSI (“**Code**”).

## 2. EFFECTIVE DATE

This Code is effective from June 24, 2021 and stands amended with effect from \_\_\_\_\_, 2026.

## 3. TERMS AND DEFINITIONS

<sup>1</sup>Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be or in any amendment thereto.

## 4. PRINCIPLES OF DISCLOSURE

The Company shall adhere to the principles as mentioned in Schedule A to the PIT Regulations and ensure the following:

- 4.1. 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;
- 4.2. Uniform and universal dissemination of UPSI to avoid selective disclosure;
- 4.3. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
- 4.4. Appropriate and fair response to queries on news reports and requests for verification of market rumors by Regulatory Authorities;
- 4.5. Not to share UPSI with analysts and research personnel;
- 4.6. Develop 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; and
- 4.7. Handling of all UPSI on a need-to-know basis.

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<sup>1</sup> Definition of UPSI amended by the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2025 (w.e.f. June 10, 2025).

## **5. CHIEF INVESTOR RELATIONS OFFICER (CIRO)**

- 5.1. The Chief Compliance Officer shall act as Chief Investor Relations Officer (“CIRO”). The CIRO shall be responsible to deal with dissemination of information and disclosure of UPSI to the stock exchanges, analysts, shareholders and media.

## **6. DISCLOSURE OF INFORMATION**

- 6.1. The CIRO shall ensure:
- a. 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;
  - b. uniform and universal dissemination of UPSI to avoid selective disclosure; and
  - c. prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to ensure that this information is made generally available.
- 6.2. In certain circumstances, the Company may, for a limited period, keep material information confidential as required under the applicable Regulations, where immediate disclosure could (i) prejudice the Company’s strategic business interests or opportunities, (ii) be restricted due to confidentiality obligations owed to third parties, (iii) involve uncertainty of events, or (iv) pertain to matters that are not yet sufficiently concrete. The decision regarding the timing of disclosure of such material information shall be taken by the Managing Director & CEO, or in his/her absence, by the Chief Financial Officer, Chief Compliance Officer, or the Company Secretary.
- 6.3. It is clarified that information to be termed as UPSI should be specific and intended to be generally made available at a point of time to ensure it does not lead to creation of a false market in securities. For the purpose of disclosure, CIRO may consult such officials within the Company to ensure the correctness and credibility of the UPSI.
- 6.4. The CIRO shall authorise disclosure or dissemination of UPSI:
- a. by way of intimation to the stock exchanges
  - b. on the official website of the Company to ensure official confirmation and documentation; and
  - c. in any other manner as may be decided by the CIRO to facilitate uniform and universal dissemination of UPSI.

## **7. DISCLOSURES**

This Code and every amendment thereto shall be promptly intimated to the stock exchanges where the Company’s securities are listed and shall be published on the Company’s official website.

## **8. AMENDMENTS**

The Code is subject to review by the Board of Directors as and when deemed necessary. Any subsequent amendment/ modification in the SEBI Regulations impacting the provisions of this Code shall automatically apply and the relevant provision(s) of this Code shall stand modified and / or amended to that extent, even if not incorporated herein.