SYMBIOTEC

Date: September 03, 2026

To,

Sr. General Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers Dalal Street,
Mumbai - 400001.
Scrip Code: 544889
ISIN: INE899I01028

Sr. General Manager
Listing Department
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G
Bandra-Kurla Complex, Bandra (East),
Mumbai - 400051.
Scrip Symbol: SYMBIOTEC
ISIN: INE899I0102

Subject: **Intimation under Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir/Madam,

In continuation to our earlier intimation dated September 01, 2026 under Regulation 8(2) of the SEBI (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("SEBI PIT Regulations"), please find enclosed herewith the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information framed under Regulation 8(1) of SEBI PIT Regulations.

This is for your information and record.

Thanking You,

For SYMBIOTEC PHARMALAB LIMITED

SALIL JAIN

Digitally signed by SALIL JAIN
DN: c=IN, st=Madhya Pradesh, 2.5.4.20=a1a6e480a12712d28e6ce438455309c025d5e248085efbba93037fc43cc7ad74, postalCode=452016, street=CO Salil Jain 409 B Shankheshwar Parshwanath Township Behind Kasliwal Trucking Bharat Benz Kanadia Bypass Road Near Bhandari Resort S P Villas Indore, pseudonym=e4e22caec3ce41ea9bbb5b94163b61f9, title=8417, serialNumber=32d8c08852292be4a92acea71a70d0494eb4d1032e2fa29b5320251912bab3b5, o=Personal, cn=SALIL JAIN
Date: 2026.09.03 13:15:21 +05'30'

Salil Jain
Company Secretary and Compliance Officer
Membership No. A41610

Encl.: As Above

EFFECTIVE DATE

The Policy shall come into effect on: **December 15, 2025**

CODE OF FAIR DISCLOSURE PRACTICE

INTRODUCTION:

In terms of Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of Symbiotec Pharmalab Limited (**"the Company"**) had formulated the Fair Disclosure Code.

The company endeavours to preserve the confidentiality of unpublished price sensitive information (UPSI) and to prevent its misuse. To achieve these objectives and in compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, the company has adopted this Fair Disclosure Code.

This Code ensures timely and adequate disclosure of UPSI which would impact the price of its securities and to maintain uniformity, transparency and fairness in dealing with all its stakeholders.

DEFINITIONS:

a) **"Act"** means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.

b) **"Audit Committee"** means the committee constituted by the board of directors in accordance with the Section 177 Act and Regulation 18 of LODR Regulations, as constituted from time to time.

c) "**Board of Directors**" shall mean the Board of Directors of the Company.

d) **"Company"** means Symbiotec Pharmalab Limited.

e) **"Connected Person"** means as defined under Rule 2(1)(d) of the SEBI PIT Regulations.

f) **"Employee"** means employee of the company.

g) **"Insider"** means a person who is:
  i. a connected person; or
  ii. in possession of or having access to unpublished price sensitive information

h) **"Investigators"** means that person authorised, appointed, consulted or approached by the Chairman of the Audit Committee and includes the Compliance Officer and auditors of the company.

i) **"Code"** means Code of Fair Disclosure Practices.

j) **"Trading"** means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

k) **“SEBI”** means the Securities and Exchange Board of India.

l) **“SEBI PIT Regulations”** means SEBI (Prohibition of Insider Trading) Regulations, 2015.

m) **“Unpublished Price Sensitive Information”** means as defined in Rule 2(1)(n) of the SEBI PIT Regulations.

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the Companies Act, 2013, SEBI PIT Regulations or any other applicable law or regulation to the extent applicable to the Company.

PRINCIPAL OF FAIR DISCLOSURE OF UPSI:

In order to adhere to the principles as mentioned in Schedule A to the SEBI PIT Regulations, the company shall:

- Promptly disclose publicly any UPSI that would impact price discovery no sooner than credible and concrete information comes into being so that such information is generally available.
- Uniformly and universally disseminate in a timely manner UPSI to avoid selective disclosure by communicating the same to the stock exchange(s) and disclosing the same on its website.
- Disclose press releases issued by it from time to time which are considered to be important for the general public besides putting the same on the Company’s website. “Legitimate Purpose” shall mean sharing of UPSI in the ordinary course of business or on a need-to-know basis. The Company may share the UPSI if required in the interest of the Company.
- Put on the Company’s website quarterly and annual financial results and all investor presentations pertaining to such financial results for reference of the general public.
- Promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- Ensure that appropriate and fair response is provided to queries on news reports and requests for verification of market rumours by regulatory authorities such as stock exchanges, etc. (Note: The Company shall not comment on every market rumour unless it is required to do so in terms of the SEBI Regulations).
- Ensure that information shared with analysts and research personnel is not UPSI.
- Develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences, wherever required as per law, available on the Company’s website to ensure official confirmation and documentation of disclosures made.
- Handle all price sensitive information on a need-to-know basis by creating suitable safeguards to avoid UPSI becoming available to any person who is not required to have access to such information. UPSI may however be disclosed to persons who need such information for furtherance of legitimate purposes, performance of duties or discharge of legal obligations in relation to the Company. The “Policy for determination of legitimate purposes” is as under:
    a) UPSI can be shared only on a need-to-know basis and for legitimate purposes and not to evade or circumvent the prohibitions of the SEBI PIT Regulations.

b) UPSI can be shared in the ordinary course of business only if the same is necessary to be shared in order to complete any task / activity / deal including any other assignment for furtherance of the business interests of the Company.
Subject to conditions prescribed in (a) and (b) above, UPSI can be shared with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. in respect of proposed assignment or in order to avail professional services from them or other business purposes, as the case may be. UPSI can also be shared in case same is mandatory for performance of duties or discharge of legal obligations.

Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "insider" for purposes of the SEBI PIT Regulations, 2015.

CHIEF INVESTOR RELATION OFFICER (CIRO):

- The Board of Directors of the company appoint a CIRO, who will be reporting to the Chief Financial Officer (CFO) of the Company, to deal with dissemination of information and disclosure of UPSI. The CIRO may be contacted by e-mail at: **secretarial@symbiotec.com**.
- The CIRO shall be responsible for compliance of this Fair Disclosure Code.
- Employees of the Company shall not respond under any circumstances to enquiries from the stock exchanges, the media or others unless authorised to do so by the CIRO or by the CFO of the Company.

REVIEW OF THIS POLICY:

This policy is framed based on the provisions of the requirements of the SEBI PIT Regulations. In the event of any conflict between the provisions of this Policy and of the SEBI PIT Regulations or any other statutory enactments, rules, the provisions of such SEBI PIT Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the SEBI PIT Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy. Any changes or modification on the Policy would be approved by the Board of Directors.