

Date: August 18, 2026

To,
BSE Limited (BSE)
20th Floor, P.J. Towers
Dalal Street
Mumbai – 400001

National Stock Exchange of India Limited (NSE)
Exchange Plaza, C-1, Block G
Bandra Kurla Complex, Bandra (E)
Mumbai – 400051

BSE Scrip Code: 544868

NSE Scrip Symbol: MILKYMIST

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

Dear Sir/Madam,

This is to inform you that, pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**”), Milky Mist Dairy Food Limited (the “**Company**”) has framed a Code of Fair Disclosure and Code of Conduct for Prevention of Insider Trading. In accordance with Regulation 8(2) of the SEBI PIT Regulations the same is being submitted herewith.

A copy of the said Code is enclosed herewith and has also been uploaded on the Company’s website at <https://www.milkymist.com/policies1>.

This intimation is being submitted for your information and records.

You are requested to kindly take the same on record and disseminate it appropriately to all concerned.

Thank You.

For Milky Mist Dairy Food Limited
(formerly Known as Milky Mist Dairy Food Private Limited)

S Prakash
Company Secretary and Compliance Officer
Membership No: A22495

Enclosed: a/a

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

I. INTRODUCTION

In pursuance to the Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time (“Insider Trading Regulations”), it is required that the board of directors of every listed company shall formulate a code of practices and procedures for fair disclosure of unpublished price sensitive information. This document (“Code”) embodies the code of practices and procedures for fair disclosure of unpublished price sensitive information to be followed by the Company effective from the commencement of listing and trading of the equity shares of the Company on the stock exchange(s), i.e. BSE Limited or National Stock Exchange of India Limited, in accordance with applicable laws provided however that the relevant provision of the Insider Trading Regulations which are applicable to the companies ‘proposed to be listed’ shall become applicable with immediate effect.

II. OBJECTIVE

The Code intends to formulate a defined framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Company’s securities and to maintain the uniformity, transparency and fairness in dealings with all stakeholders and ensure adherence to applicable laws and regulations. The Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent misuse of such information.

III. UNPUBLISHED PRICE SENSITIVE INFORMATION

Unpublished Price Sensitive Information (“UPSI”) means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily include but not restricted to, information relating to the following;

- (i) Periodical financial results of the Company;
- (ii) Intended declaration of dividends (Interim and Final);
- (iii) Change in capital structure;
- (iv) Mergers, De-mergers, acquisitions, delistings, disposals and expansion of business, and such other transactions;
- (v) Any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company;
- (vi) Changes in key managerial personnel;
- (vii) Such other information that the Company may decide from time to time.

IV. PRINCIPLES OF FAIR DISCLOSURE

The Company shall adhere to the following principles to ensure timely and fair disclosure of UPSI:

- i. Prompt public disclosure of UPSI that would impact price discovery, as soon as it has credible and concrete information, to make such information generally available.
- ii. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- iii. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities
- vi. Ensuring that information shared with analysts and research personnel is not UPSI. The Company shall be careful while answering to the queries of analysts. Unanticipated questions shall be taken on notice and a considered response shall be given later.
- vii. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the Company's website to ensure official confirmation and documentation of disclosures made.
- viii. Handling of all UPSI on a need-to-know basis. UPSI shall be disclosed to Company officials only after a proper clarification is sought as to the purpose for which the information is needed.

V. CHIEF COMPLIANCE OFFICER AND CHIEF INVESTOR RELATIONS OFFICER

The Board of Directors of the Company has designated the Company Secretary as the Chief Compliance Officer (CCO) and the Chief Financial Officer as the Chief Investor Relations Officer (CIRO) of the Company to deal with dissemination of information and disclosure of UPSI.

The CCO and CIRO is responsible for dissemination of information and disclosure of UPSI. The CCO is also responsible for ensuring compliance under this code, overseeing and coordinating disclosure of UPSI to the stock exchanges, shareholders, analysts and media and for educating the Company's employees on disclosure policies and procedure.

All UPSI is to be handled on "need to know basis", i.e., UPSI should be disclosed only to those who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All the non-public information directly received by any employee should immediately be reported to the CCO/CIRO.

Other than information which is price sensitive in accordance with the SEBI PIT Regulations or any other applicable law for the time being in force, the CCO in consultation with the Chairman/Managing Director shall decide whether an information is price sensitive or not.

All information disclosure/dissemination may normally be approved in advance by the CCO/CIRO. In case information is accidentally disclosed without prior approval of CCO/CIRO, the person responsible shall immediately inform the CCO/CIRO.

The CCO and CRO shall ensure that no UPSI is disclosed selectively to any one or group of research analysts or investors to the disadvantage of other stakeholders.

VI. PROMPT DISCLOSURE OF UPSI

The Company will ensure that any event which has a bearing on the share price of the Company shall be disseminated promptly upon the conclusion of the event, by communicating the same to the stock exchanges in accordance with the SEBI PIT Regulations.

To ensure that the information is disseminated in a uniform manner, the Company will transmit the information to all the stock exchanges where the securities of the Company are listed, at the same time and shall also publish the same on the website of the Company viz. www.milkymist.com.

VII. SHARING OF INFORMATION WITH ANALYSTS AND RESEARCH PERSONNEL

- i. The Company shall ensure that any information shared with analyst and research personnel is not UPSI and is generally available. Alternatively, the information shared above shall simultaneously be made public.
- ii. The CRO shall also 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.

VIII. RESPONDING TO MARKET RUMOURS

The CRO shall ensure that appropriate and fair responses are provided to queries on news reports and requests for verification of market rumours by regulatory authorities. In case a query/request has been received from any stock exchange, a copy of such reply shall be sent to other stock exchange(s) also where securities of the Company are listed, if any.

IX. LEGITIMATE PURPOSE

The UPSI can be shared by an Insider for Legitimate purposes as per its **“Policy for Determination of Legitimate Purposes” (Annexure A)**, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

X. PUBLICATION OF POLICY

This Policy, as approved by the Board, shall be disclosed in the Annual Report and on the website of the Company at www.milkymist.com.

XI. AMENDMENT

In case of any subsequent changes in the provisions of the Act or Regulations or Income Tax Act, 1961 or any other regulations which makes any of the provisions of this Policy inconsistent with the Act or such other regulations, then the provisions of the Act or such other regulations would prevail over this Policy and the relevant provisions contained in this Policy would be modified accordingly in due course to make it consistent with applicable laws.

Any such amendments shall be disclosed along with the rationale for the same in the Annual Report and on the website of the Company.

ANNEXURE A

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

INTRODUCTION

This “Policy for Determination of Legitimate Purposes” hereinafter referred to as the “Policy” is prepared in accordance with Regulation 3(2A) of the Insider Trading Regulations.

OBJECTIVE

The objective of this policy is to identify ‘Legitimate Purposes’ for performance of duties or discharge of legal obligations, which will be considered as exception for procuring UPSI relating to the Company. The assessment of whether sharing of UPSI for a particular instance would tantamount to ‘legitimate purpose’ would depend on the specific facts and circumstances of each case. Accordingly, this Policy only sets out the principles that should be considered while assessing if the purpose for which UPSI is proposed to be shared is “legitimate”. Primarily, the following factors should be considered to determine the legitimate purpose:

- a) whether sharing of such information is in the ordinary course of business of the Company;
- b) whether information is sought to be shared to evade or circumvent the prohibitions of the Insider Trading Regulations;
- c) whether sharing the information is in the best interests of the Company or in furtherance of a genuine commercial purpose;
- d) whether the information is required to be shared for enabling the Company to discharge its legal and/or contractual obligations;
- e) whether the nature of information being shared is commensurate to the purpose for which access is sought to be provided to the recipient.

It is clarified that in the event there exist multiple purposes for sharing UPSI, each purpose will be evaluated on its own merits, in line with the aforementioned principles.

DIGITAL DATABASE

A structured digital database shall be maintained containing the nature of UPSI and the names of such persons or entities with whom information is shared or who has shared such information along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. This digital database should be preserved for a period of not less than eight years after completion of the relevant transactions.

DEFINITIONS

In accordance with this Code, “Legitimate Purposes” means sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

- a) Company’s partners
- b) Auditors, accountancy firms, legal advisors, and merchant bankers
- c) Collaborators
- d) Lenders
- e) Customers
- f) Suppliers
- g) Insolvency professionals
- h) Any other advisors/consultants/partners

The Board may review or modify the above definition of legitimate purposes, subject to applicable law.