Paras Healthcare Limited

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)[1]

[1] Approved by the Board of Directors in their meeting held on October 26, 2026

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

I. OBJECTIVE AND INTRODUCTION

This Code is framed pursuant to the requirements of Regulation 8(1) read with Clause 2A of Regulation 3 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations"), that every listed company is required to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI).

The Company is committed to preserving the confidentiality of Unpublished Price Sensitive Information (UPSI) and preventing its misuse. In compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors has adopted this Code of Practices and Procedures for Fair Disclosures of UPSI. The Code ensures timely and adequate disclosure of UPSI that could impact the prices of the Company's securities, maintaining uniformity, transparency, and fairness in dealing with all stakeholders.

This Code shall come into force from the date of listing of the securities of the Company on recognized stock exchanges.

II. DEFINITIONS

a. **"Generally Available Information"** means information that is accessible to the public on a non-discriminatory basis.

b. **"Insider"** means any person who is: i) a Connected Person; or ii) in possession of or having access to unpublished price sensitive information.

c. **"Legitimate Purpose"** shall include sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of SEBI PIT Regulations.

d. **"Unpublished Price Sensitive Information" or "UPSI"** shall mean as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015, amended from time to time, as applicable for the time being in force.

III. PRINCIPLES OF FAIR DISCLOSURE

a) Credible and Concrete Information - 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) **Refrain from Discriminatory Disclosure -** Uniform and universal dissemination of UPSI to avoid selective disclosure.

c) **The Company Secretary** of the Company or such senior officer, as designated by the Board, shall act as the **Chief Investor Relations Officer (CIRO)** for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.

d) **Prompt dissemination of UPSI -** UPSI shall be shared by the Company with stock exchanges promptly and shall also be uploaded on the Company's official website, in compliance of regulatory requirements.

e) **Addressing market speculations -** Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

f) **Principles for Disclosure and Transparency in Analyst and Investor Relations -** The Company shall exclusively provide public information to analysts, research personnel, and large investors such as institutions and shall ensure that information shared with analysts and research personnel is not UPSI.

g) **Developing best practices** - The Company shall adhere to best practices by making transcripts or records of these earnings calls readily accessible on its website. This ensures official confirmation and documentation of the disclosures made during such earnings calls.

h) The Company shall inform the Exchanges of any meetings with Analysts or Investors or Investor Conferences being attended by the Company representatives in compliance with relevant Regulations.

i) **Price-Sensitive Information on a Need-to-Know Basis -** UPSI shall be managed exclusively on a "need-to-know" basis, meaning it will only be disclosed to individuals or entities where such communication serves legitimate purposes, fulfills professional duties, or meets legal obligations.

IV. POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

A structured digital database shall be maintained containing the nature of UPSI and the names of such persons who have shared the information and also the names of such persons or entities, as the case may be, with whom information is shared for legitimate purpose along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number 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.

The Company shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt

of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings. Following factors must be satisfied while determining what constitutes a legitimate purpose:

i. Must be shared in the ordinary of course of business or for Corporate Purpose;
ii. Required to be done in furtherance of fiduciary duties or in fulfillment of any statutory or contractual obligation;
iii. The action is executed in a manner which is considered fair and transparent;
iv. Information shared is in the interest of Company or in furtherance of a genuine commercial purpose and should not result in personal benefit to the Insider; and
v. Nature of UPSI being shared is commensurate with the purpose for which access is sought to be provided to the recipient.

No insider shall communicate, provide, or allow access to any UPSI, relating to securities of the Company, to any person including other insiders except where such communication is in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any insider of UPSI, relating to securities of the Company, except in furtherance of Legitimate Purposes, 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 SEBI PIT Regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations.

V. DISCLOSURE OF CODE

This Code and every amendment hereto will be promptly intimated to the stock exchanges where the Company's securities are listed along with the simultaneous disclosure on Company's website.

VI. REVIEW, LIMITATION AND AMENDMENT

The Board of Directors shall review this Code as may be deemed necessary and in accordance with any regulatory amendments.

In the event of any conflict between the SEBI PIT Regulations or any other statutory enactments ("Regulations") and the provisions of this Code, the Regulations shall prevail over this Code.

Any subsequent amendment/modification in the Regulations in this regard, shall automatically apply to this Code.