



Symphony Limited

Investor Relations Policy

Version: 1.1

Effective from Oct 20, 2023

I. PURPOSE

Symphony Limited (together with its subsidiaries, the “Company” or “Symphony”) is committed to providing timely, orderly, sufficient, and reliable material information to shareholders, investors, analysts, media, and the financial markets (all referred to as the “Investment Community”) in a coherent manner. The purpose of this policy is to state the principles followed by the Company for engagement with the Investment Community, ensuring dissemination of accurate and timely communications to the Investment Community in compliance with the prevailing regulatory guidelines.

II. AUTHORIZED SPOKESPERSONS

The only persons authorized to speak on behalf of the Company to the Investment Community are the following personnels (“Authorized Spokespersons”) of the Company:

- ✓ *Chairman and Managing Director (CMD)*
- ✓ *Executive Director (Corporate Affairs)*
- ✓ *Group CEO & Executive Director*
- ✓ *Chief Financial Officer (CFO)*
- ✓ *Head (Investor Relations)*
- ✓ *Any other persons authorized from time to time by any one of the above Authorized Spokespersons.*

The Company, through its Authorized Spokesperson(s), interacts with the investment community through –

- ✓ *Quarterly earnings conference calls*
- ✓ *Event-based conference calls*
- ✓ *Non-Deal Domestic Roadshows*
- ✓ *Non-Deal International Roadshows*
- ✓ *Investors and Analysts conferences and meets*
- ✓ *One-to-one and group meetings and calls with investors and analysts*

III. SILENT PERIOD

The Company observes a “Silent” period from the end of the quarter/year for which results are required to be announced by the Company, up to the earnings release for the said quarter/year. During this period, Authorized Spokespersons of the Company should NOT meet and/or interact with the Investment Community to discuss information which is not in the public domain.

During the silent period, the Company will continue to issue press releases and communicate with the media if required regarding its business, products, or operations, including releases or communications on historical financial information.

IV. CLOSURE OF THE TRADING WINDOW

The trading window for dealing in shares of the Company by its designated persons and their immediate relatives remains closed pursuant to the provisions of SEBI (Prohibition of Insider

Trading) Regulations 2015, its amendments from time to time and the Company's Internal Code for Prevention of Insider Trading.

V. PERIODIC REPORTING OF FINANCIAL AND BUSINESS PERFORMANCE

The Company will provide an annual report of its financial and business performance in a timely manner following the fiscal year-end. Interim reporting of the Company's financial and business performance will be provided periodically, including quarterly reporting, by the Company through earnings presentations, corporate presentations, press releases etc.

VI ANALYST MEETINGS, INVESTOR MEETINGS, CONFERENCES AND NON-DEAL ROADSHOWS

This Policy will apply to communications between Authorized Spokesperson(s) and investment community at analyst meetings, investor meetings, conferences, and non-deal roadshows. Presentation to be made at such events should be placed on the Company's website under intimation to stock exchanges prior to such events and no unpublished price sensitive information is to be shared during such events.

VII. HEADQUARTER VISIT

The Company may conduct visits to its headquarter for analysts or investors and take care to avoid opportunity where the visitor might gain material, non-public information in the process. Head (Investor Relations) of the Company should be present during all visits with analysts and investors.

VIII. EARNINGS GUIDANCE TO THE MARKETS

The Company refrains from giving its own specific estimates or projections for financial parameters and therefore, its Authorized Spokespersons cannot give revenue / earnings guidance in any form (including "soft" or indirect guidance).

Any forward-looking statements by any of the Company's Authorized Spokespersons about the strategy for growth, product development, market positions etc. are based on certain assumptions and expectations of future events, and the Company assumes no responsibility to publicly amend, modify or revise any of forward-looking statements based on any subsequent development, information, event or otherwise.

Analyst reports and earnings models may only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other feedback or guidance on earnings models may be communicated to analysts. None of the Company's employees should distribute (including via a web-link) copies of analysts' reports on the Company to anyone outside the Company, without the express approval of any of the Authorized Spokespersons.

IX. DEALING WITH RUMOURS

The Company's general policy is not to comment upon rumours concerning the business and affairs of the Company. When it is learned that rumours about the Company are circulating, Authorized Spokesperson(s) should state only that it is the Company's policy to not comment on rumours. If the source of the rumour is found to be internal, the concerned Department of the Company should be consulted to determine the appropriate response.

However, the Company may comment on market rumours on exceptional basis when it is required by applicable rules and regulations to clarify / rectify incorrect information that may have a material impact on the share price of the Company.

X. VIOLATION OF THIS POLICY

Any violation of this policy by an employee, director of the Company or any of its subsidiaries shall be brought to the attention of Compliance Officer of the Company and may constitute grounds for disciplinary action including and up to termination of services.

XI. REVIEW OF THIS POLICY

This policy shall be periodically reviewed and updated.
