

# Magnite Developers Private Limited

Regd. Office Address - 3rd Fl , S.No 34, Near Inorbit Mall Nagar Road, Wadgonsheri,Pune-411014

Email:- [bhushan@vtppgroup.in](mailto:bhushan@vtppgroup.in)

CIN: U45309PN2022PTC207434

---

## MAGNITE DEVELOPERS PRIVATE LIMITED

### CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

#### ***Introduction***

Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**Regulations**") requires every listed company to formulate a code of practices and procedures for fair disclosure of unpublished price sensitive information ("**UPSI**") that it would follow in order to adhere to each of the principles set out in Schedule A of the Regulations. This code (the "**Code**") is prepared by Magnite Developers Private Limited (the "**Company**") to comply with the said requirement of the Regulations.

#### ***Timely dissemination of UPSI***

All UPSI shall be made generally available in public domain in a timely manner. All UPSI shall be deemed to be have been generated only on entering of definitive agreements/ credible and concrete information and not on a possibility/likelihood.

#### ***Modes for dissemination of UPSI***

All UPSI shall be disseminated through notification to the stock exchanges/ press release/ hosting on Company's website or any combination thereof.

#### ***Chief Investor Relations Officer***

The Chief Financial Officer of the Company is authorized to discharge the function of Chief Investor Relations Officer relating to the dissemination of information and disclosure of UPSI, including determining whether an information constitutes UPSI and the timing/ mode of dissemination of UPSI, if so required. In case any UPSI requiring disseminating has been disclosed selectively, inadvertently or otherwise, the Chief Investor Relations Officer shall ensure that such UPSI is generally available.

#### ***News Reports/ Market Rumors***

The Company does not follow the practice of responding to news reports/ market rumors, unless they are grossly incorrect. The Company shall cooperate and provide appropriate and fair response to queries on news reports and request for verification of market rumors from regulatory authorities.

#### ***Analyst / Investor presentation / conference calls***

The Company will ensure that the information shared with analysts and research personnel is not UPSI.

The Company shall upload a presentation on the quarterly financial results on its website. The Company shall also upload the transcript of the conference call on the quarterly financial results on the website of the Company.



# Magnite Developers Private Limited

Regd. Office Address - 3rd Fl , S.No 34, Near Inorbit Mall Nagar Road, Wadgonsheri,Pune-411014

Email:- [bhushan@vtppgroup.in](mailto:bhushan@vtppgroup.in)

CIN: U45309PN2022PTC207434

---

## ***Information on Need to Know basis***

All UPSI shall be handled on a need-to- know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The term "legitimate purpose" shall include sharing of unpublished price sensitive information 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 the Regulations. The policy for Determination of Legitimate Purposes is annexed hereto and forms part of the Code.

## ***Disclosure of Code***

This Code shall be hosted on the website of the Company.

