



May 31, 2022

**BSE Limited**

Corporate Services Department  
Phiroze Jeejeeboy Towers  
Dalal Street, Mumbai-400 001

**Scrip Symbol:** QUINT

**Scrip Code:** 539515

**Subject: Intimation under SEBI (Prohibition of Insider Trading) Regulations, 2015**

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Dear Sir/Madam,

We wish to inform you that the Board of Directors of the Company at their meeting held on Monday, May 30, 2022, has adopted a revised "Code of Conduct to Regulate, Monitor and Report Trading in Securities by Designated Persons and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" in compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Copy of the revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is enclosed herewith.

The Revised Code is effective from May 30, 2022 and shall be made available on the Company's website at [www.quintdigitalmedia.com](http://www.quintdigitalmedia.com).

We request you to take the above information on record.

Yours sincerely

**For Quint Digital Media Limited**

QUINT DIGITAL MEDIA LTD.



Company Secretary

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**Tarun Belwal**

Company Secretary & Compliance Officer

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**QUINT DIGITAL MEDIA LIMITED**

*(Formerly known as Gaurav Mercantiles Limited)*

**Registered Office: 403 Prabhat Kiran, 17, Rajendra Place, Delhi- 110008 Tel: 011 45142374**

**Corporate Office: Carnousties's Building, Plot No. 1, 9th Floor, Sector 16A, Film City, Noida-201301 Tel: 0120 4751818**

**Website: [www.quintdigitalmedia.com](http://www.quintdigitalmedia.com), email: [cs@thequint.com](mailto:cs@thequint.com), CIN: L74110DL1985PLC373314**



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FOR FAIR DISCLOSURE OF UNPUBLISHED  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

## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Fair Disclosure Code” or “Code”)**

[Pursuant to Regulation 8 (1) read with Schedule A of the SEBI [Prohibition of Insider Trading) Regulations, 2015]

The Board of Directors of the Company is committed to manage the affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest of all stakeholders. The Company upholds the basic tenets of Corporate Governance and to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework of the Company by prohibiting and regulating such activities within the applicable law.

The Code was adopted by the Board of Directors at their meeting held on March 20, 2019 and came into force w.e.f. April 1, 2019 and subsequently reviewed and approved with certain amendments in the same on May 30, 2022.

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, in relation to the securities of the Company, is framed in terms of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations'), as amended from time to time.

In terms of the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the 'Code'), the Company will ensure:

- Prompt public disclosure of unpublished price sensitive information ('UPSI') that would impact price discovery, as soon as it has credible and concrete information, in order to make such information generally available i.e. make the information available to the public on a non-discriminatory basis.
- Uniform and universal dissemination of UPSI to avoid selective disclosure.
- Prompt dissemination of UPSI that may get disclosed selectively, inadvertently or otherwise, to make such information generally available.
- Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities, other than news reports motivated by vested interests, the clarification of which is likely to be detrimental to the interests of the Company and the shareholders or to the advantage of the Company's competitors, existing or potential.
- That information shared with analysts and research personnel is not UPSI.

During interactions with the investor community, the Company will ensure that no UPSI is disclosed selectively to any one or group of research analysts or investors to the disadvantage of other stakeholders. In the unlikely event of any UPSI being disclosed selectively, inadvertently or otherwise, at a meeting with analysts or at any investor relations conference, such UPSI would be promptly communicated to the Stock Exchanges where the Company's securities are listed.

Material content of communication shared with analysts and at investor relations conferences will be put up on the Company's corporate website either in the form of FAQs or in any other appropriate manner for general dissemination.

The Company shall 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.

The Company will ensure that handling of all UPSI is on a need-to-know basis. 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.

UPSI shall be considered to be communicated for legitimate purpose when any employee or any other insider (who is in possession of such information):

- communicates such information, in the ordinary course of business, to the auditors, lenders, customers, suppliers, legal advisers, merchant bankers, partners, collaborators, insolvency professional or any other advisers or consultants as may be considered necessary;
- submits or provides such information to a court of law or any governmental or regulatory authority;
- communicates or shares such information for any other genuine or reasonable purpose as may be determined by the Compliance Officer of the Company ('the Board').

Any person or entity in receipt of UPSI pursuant to 'legitimate purpose', as stated above, shall be considered an 'Insider' for the purpose of the Regulations and due notice shall be given to such person or entity to maintain confidentiality of the UPSI.

The Compliance Officer of the Company has been designated/ called as the "Chief Investor Relations Officer" for the purpose of dealing with dissemination of information and disclosure of UPSI relating to the Company to the investors, analysts, press and electronic/ social media.

The Code will be posted on the Company's corporate website [www.quintdigitalmedia.com](http://www.quintdigitalmedia.com).

The Code is subject to review by the Board as and when deemed necessary.