

Vasuki India Trust

Media Policy

Introduction:

Vasuki India Trust (“**Trust**”) is registered as a category III Alternative Investment Fund with the Securities and Exchange Board of India (“**SEBI**”).

Various SEBI Rules, Regulations and circulars are applicable to the Trust, its schemes, and its Investment Manager.

This Media Policy outlines the guidelines and procedures for media interactions by the Personnel of Vasuki Group. It aims to ensure accurate, consistent, and responsible communication that reflects the fund's values, protects sensitive information, and adheres to regulatory requirements.

This Media Policy demonstrates commitment of the Vasuki Group to transparent, responsible, and compliant communication with the media, clients, investors, and stakeholders.

Effective Date:

This Media Policy is applicable immediately from August 8, 2023.

Applicability:

This Media Policy is applicable to all Employees, Associates, Consultants of the Vasuki Group.

This policy should be read in conjunction with following:

1. Employee manual
2. Vasuki Conflict of Interest Policy
3. Vasuki Insider Trading Policy
4. Applicable Laws

Definitions:

1. “**Applicable Laws**” means any central, state, local, municipal, foreign, international, constitution, law, statute, treaty, rule, regulation, ordinance, code, case law or principle of common law and includes any delegated legislation or a directive of a Governmental Authority.
2. “**Fund/Scheme**” means any scheme of Vasuki India Trust.
3. “**Fund Portfolio Entities**” means any company or any other listed/unlisted entity or venture in which the Fund makes or proposes to make an investment in compliance with the AIF Regulations, either by subscription to or acquisition of Securities.
4. “**Investment Manager**” means Vasuki Hind Capital Private Limited, the investment manager of the Fund.
5. “**Investors**” means the persons who have executed a contribution agreement with the Fund.
6. “**UPSI**” i.e. Unpublished Price Sensitive Information means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon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 including but not restricted to, information relating to the following:
 - (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;

- (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions.
 - (v) changes in key managerial personnel.
7. **“Vasuki Group”** means Vasuki India Trust, Its Investment Manager i.e. Vasuki Hind Capital Private Limited, Consultants working exclusively for the Trust or its Investment Manager.
 8. **“Personnel”** means to all Directors, Employees, Associates, Consultants of the Vasuki Group.
 9. **“Relative”** means a person as defined in sub section (77) of section 2 of the Companies Act, 2013 and who is financially dependent on the Personnel
 10. **“Media”** means any of radio or television or internet or web or print media or social media broadcast
 11. **“Public Appearance”** means any participation in a conference call, seminar, forum (including interactive and non-interactive electronic forum), radio or television or internet or web or print media broadcast, authoring a print media article or other public speaking activity in public media in which a Personnel makes a recommendation or offers an opinion, concerning securities or public offer.

Provided that it does not include a password protected webcast, conference call or such other events with the clients, if all of the event participants previously received the research report or other documentation that contains the required applicable disclosures and that the Personnel appearing at the event corrects and updates during the public appearance any disclosures in the research report that are inaccurate, misleading or no longer applicable; (r) “public media” means any media source available to the general public and includes a radio, television, internet, web or print media;

12. **“Subject Company”** means the company whose securities are the subject of a research report or a Public Appearance.

Policy Statement:

Designated Personnel:

Only those Personnel who are specifically approved in writing to represent the Vasuki Group can speak to the Media and make Public Appearance as a representative of the Vasuki Group.

Consistent Messaging:

All communication in the Media or Public Appearance must align with Vasuki Group's vision, values, and strategic objectives. Messaging should be consistent across different communication channels to prevent confusion or misinterpretation.

Disclosure and Transparency:

Interactions in Media or during Public Appearance must provide accurate and current information.

Material information impacting investors, clients, or stakeholders must not be disclosed except with prior written approval of the Vasuki Group and in accordance with relevant regulations.

Personnel must follow insider trading and securities laws when discussing investment strategies, portfolio holdings, or performance metrics.

Conflicts:

Personnel must provide necessary disclosure to the Vasuki Group in the format provided in *Annexure A* herewith while seeking prior approval for a Public Appearance of Media interaction.

Confidential and Sensitive Information:

Personnel must avoid sharing confidential or sensitive information, such as any details of Fund Portfolio Entities, Fund portfolio details, group structure, details of internal committees and its members, Investors information, non-public financial data or any UPSI.

Any potential disclosure of sensitive information requires consultation with the Group's legal counsel.

Regulatory Compliance:

All media interactions and Public Appearances must comply with applicable financial and securities regulations.

Views expressed by the Personnel in Media or during the Public Appearances must not violate any Applicable Laws.

Social Media Guidelines:

Personnel should exercise professionalism and discretion when mentioning Vasuki Group on personal social media accounts.

Personal opinions must be clearly distinguished from official company statements. Any Personal opinions expressed by any Personnel during Public Appearances or in Media will be their sole responsibility. Vasuki Group shall not be responsible or liable for such statements made by the Personnel in Media or during the Public Appearance in their personal capacity.

Sharing non-public or confidential information on personal social media accounts is strictly prohibited.

SEBI Regulations:

As required under the provisions of SEBI Research Analyst Regulations, 2014, as amended by SEBI from time to time the Personnel are required to adhere to the following:

1. Relevant Personnel must inform in advance in writing about any Public Appearances planned in future.
2. Within thirty days prior to and five days following the Public Appearance, Personnel is not permitted to engage in or trade in securities that they recommend or follow in such Public Appearance.
3. Personnel is not allowed to deal with or trade in securities that are the subject of a review in a way that is at odds with the suggestions given during the Public Appearance. If the issuer is primarily engaged in the same sorts of businesses as companies that the Personnel follows or advises, Personnel may not purchase or receive securities of the issuer prior to the issuer's initial public offering (IPO). Except in case there is significant company-related news or event, a change in Personnel's financial situation, not to take part in road shows and sales pitches.
4. Personnel should refrain from making a Public Appearance at any time during the following time frames:
 - (a) Forty days immediately following the day on which the securities are priced if the offering is an IPO or

(b) Ten days immediately following the day on which the securities are priced if the offering is an FPO:

Provided that the aforementioned is done within such forty days and ten-day periods. In the ten days before the date of entering into and the fifteen days following the expiration/waiver/termination of a lock-up agreement or any other arrangement, if the same is restricted or forbidden, refrain from publishing or distributing a research report about that company. If it is completed within the aforementioned forty-day and ten-day timeframes, with the Compliance officer's previous written consent and justifications given.

5. The Personnel must keep sufficient records that are backed by research for the suggestions and opinions given during a Public Appearance. These records must be made available to the internal auditor or the compliance officer upon request.
6. Personnel must not make any promises or guarantees about favorable reviews in order to start a business connection, influence it, or get paid or receive other benefits.

Amendments:

This media policy will be reviewed periodically to ensure alignment with industry practices, regulations, and company goals.

Annexure A

Name: _____

Designation: _____

Date of proposed Media interaction or Public Appearance: _____

Subject of proposed Media interaction or Public Appearance: _____

Statement of ownership, material conflicts of interest and compensation by Personnel and his, relatives and associate(s);

Disclosure of interest statement	Yes/No
Whether you or your relative, has any financial interest , other than holding of equity shares or derivatives from time to time for trading or investment purposes, in the Subject Company(ies)	
Whether you or your relative, has actual/beneficial ownership of 1% or more securities of the Subject Company(ies) at the end of the month immediately preceding the date of the Public Appearance or Media interaction.	
Whether you or your relative, has any other material conflict of interest at the time of the Public Appearance or Media interaction	
Whether you or your relative has managed or co-managed public offering of securities for the Subject Company(ies) in the past 12 months.	
Whether you or your relative has received any compensation for Investment Banking or Merchant Banking or brokerage services from the Subject Company(ies) in the past 12 months.	
Whether you or your relative has received any compensation or other benefits from the subject company(ies) or third party in connection with the Public Appearance or the Media interaction .	
Whether you or your relative is or has served as an officer, director or employee of the Subject Company.	
Whether you have been engaged in market making activity for the Subject Company(ies) in the past 12 months.	

Sign: