SILENT PERIOD POLICY

1. Purpose

The policy defines the "Silent Period" during which the Company will not engage in discussions with investors or analysts. It sets out the principles governing external communications during the time to ensure compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and to prevent the inadvertent disclosure of material, non-public information.

2. Scope

- Applies to all Directors, Key Managerial Personnel, and employees involved in communications with investors, analysts, or the investment community.
- Includes all external interactions during the Silent Period, including meetings, calls, conferences, and written communications.
- Does not restrict routine business communications in the ordinary course, provided no material, non-public information is disclosed.

3. Silent Period

Fractal will observe a "Silent Period" prior to quarterly earnings announcements. The silent period will commence on the 25th day of the last month of each quarter or financial year i.e.

- 25th March (for Q4 & FY)
- 25th June (for Q1 FY)
- 25th September (for Q2 FY)
- 25th December (for Q3 FY)

The Silent Period will conclude upon the public release of the Company's financial results for that quarter or financial year.

4. Restrictions during 'Silent Period'

The Company shall not ordinarily initiate or participate in any meetings, calls, emails, or other communications to discuss:

- The previous quarter's financial or operational performance,
- Forward-looking statements or outlook
- Any material, non-public information.

5. Permitted communications during 'Silent Period'

- The Company may respond to requests seeking clarification of publicly available historical information or general information of the business.
- The Company may participate in external conferences, events, or interactions during the Silent Period, subject to prior approval by the Investor Relations Office on a case-by-case basis, subject to compliance with this Policy
- The Company may engage externally in relation to a material event, provided such information has already been publicly disclosed in accordance with applicable regulations.

- If the Company receives unsolicited inquiries from external stakeholders regarding non-public or forward-looking matters, the Company may acknowledge receipt and offer to schedule discussions post-announcement, provided no material, non-public information is disclosed.

6. Compliance and Accountability

- Compliance with this policy is mandatory for all covered people.
- Violations of this policy may result in disciplinary action up to and including termination, as per the Company's Code of Conduct.
- The Chief Financial Officer and Investor Relations Office shall jointly oversee compliance with this policy.
- Any exceptions or clarifications required shall be escalated to the Chief Financial Officer or the Chief Strategy Officer or the Company Secretary & Compliance Officer.

7. Review and Updates

This policy will be reviewed periodically and updated, as necessary, to reflect changes in SEBI regulations, stock exchange requirements, and evolving best practices in investor communications.

8. Document Control & Revision History

- Approved at the meeting of the Board of Directors held on 29th Jul 2026
- Last amended on 29th Jul 2026