

Shri Jagdamba Polymers Limited

POLICY ON CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

PREAMBLE

This Policy on Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Policy”) is framed in accordance with Regulation 8 read with Schedule A of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time (“PIT Regulations”). The Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.

OBJECTIVE

The objective of this Policy is to ensure timely, uniform and adequate disclosure of unpublished price sensitive information (“UPSI”) to the public and to maintain fairness, transparency and integrity in the securities market.

DEFINITIONS

For the purpose of this Policy, unless the context otherwise requires:

- a) “Act” means the Securities and Exchange Board of India Act, 1992.
- b) “Board” means the Board of Directors of the Company.
- c) “Company” means Shri Jagdamba Polymers Limited.
- d) “Compliance Officer” means the Compliance Officer of the Company designated by the Board for the purpose of compliance under the PIT Regulations.
- e) “Generally Available Information” means information that is accessible to the public on a non-discriminatory basis.
- f) “Unpublished Price Sensitive Information” or “UPSI” shall mean any information, relating to the Company or its securities, directly or indirectly, that is not generally available and which upon becoming generally available is likely to materially affect the price of the securities.

Words and expressions used and not defined in this Policy shall have the meanings assigned to them under the PIT Regulations or any statutory modification thereof.

4. PRINCIPLES OF FAIR DISCLOSURE

The Company shall adhere to the following principles for fair disclosure of UPSI:

- a) Prompt public disclosure of UPSI that would materially affect the price discovery of securities.
- b) Uniform and universal dissemination of UPSI to avoid selective disclosure.
- c) Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information generally available.
- d) Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- e) Information shared with analysts, research personnel and institutional investors shall not be UPSI.
- f) Transcripts or records of proceedings of meetings with analysts and investors shall be made available on the website of the Company, as applicable.
- g) UPSI shall be handled strictly on a need-to-know basis.

5. CHIEF INVESTOR RELATIONS OFFICER

The Compliance Officer of the company shall act as the Chief Investor Relations Officer for the purpose of dealing with dissemination and disclosure of UPSI.

6. LEGITIMATE PURPOSE

UPSI may be shared by the Company in the ordinary course of business for legitimate purposes, performance of duties or discharge of legal obligations, provided that such sharing is not carried out to evade or circumvent the prohibitions of the PIT Regulations.

The term “legitimate purpose” shall include sharing of UPSI in the ordinary course of business with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided such sharing has not been carried out to evade or circumvent the provisions of the PIT Regulations.

RESPONSE TO MARKET RUMOURS

The Company shall provide appropriate and fair responses to queries raised by stock exchanges or regulatory authorities concerning any market rumours or reports. The Company may, at its discretion, respond to reports in the media or market rumours in accordance with applicable laws.

DISCLOSURE OF INFORMATION

All disclosures of UPSI shall be made in compliance with applicable laws and regulations, including the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The Company shall ensure that information is disseminated through recognised stock exchanges and other permissible communication channels.

9. PRESERVATION OF CONFIDENTIALITY

All unpublished price sensitive information shall be handled on a confidential basis. Employees, designated persons and insiders shall maintain confidentiality of UPSI and shall not communicate, provide or allow access to such information except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

AMENDMENT

The Board reserves the right to amend, modify or revise this Policy in whole or in part, in accordance with applicable laws and regulations.

REVIEW OF POLICY

This Policy shall be reviewed by the Board from time to time and updated in line with applicable statutory and regulatory requirements.

