

## **Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)**

M/s Jauss Polymers Limited has drafted and adopted the following Code of Practice and Procedure for fair disclosure of Unpublished Price Sensitive Information (hereinafter known as UPSI) in adherence to the Securities and Exchange Board of India circular No. LD-NRO/GN/2014.15/21/85 Dated 15<sup>th</sup> January 2015 which mandates all the Listed Companies to formulate practice and publish on its website a “Code of Practice and Procedure for fair disclosure of Unpublished Price Sensitive Information).

The Policy is as follows:

1. The company shall ensure prompt public disclosure of 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. to make the information accessible to the public on a non – discriminatory basis.
2. The company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure
3. The company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information ‘generally available’.
4. The company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
5. The company shall ensure that information shared with analyst and research personnel is not UPSI.
6. 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.
7. The company shall ensure the handling of all UPSI only on a need to know basis.
8. All the specified personnel who are expected to possess UPSI are directed to adhere to restrictive provision of Code of Conduct of the Company in handling and Dissemination of UPSI and to act with utmost care and diligence in handling such information.
9. The personnel who are found to be violating the provisions of Code of Conduct shall be subjected to the disciplinary actions as prescribed in such code after giving reasonable opportunity to show cause as to why appropriate action can not be initiated against the violators.
10. The Compliance Officer of the Company shall act as the Chief Investor Relation Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.
11. In unlikely event of any UPSI being disclosed selectively, inadvertently or otherwise, at any forum whether in India or Abroad, the chief Investor Relation Officer (CIRO) of the Company shall take effective steps to promptly disseminate such information to the stock exchanges, for public disclosures.
12. The Chief Investor Relations Officer (CIRO), subject to the approval of Board of Directors has powers to amend or modify this code in whole or in part and as and when warranted.