



JHS SVENDGAARD LABORATORIES LIMITED

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BSE Code: 532771

NSE Symbol: JHS

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Pursuant to sub-regulation (1) of regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015

PREFACE

This Code has been formulated in compliance of Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

PRINCIPLES

The following policy for implementation of “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” has been adopted by the Company:

- (a) The Company would make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- (b) The Company shall make a uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- (c) The Company has designated the Compliance Officer as the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- (d) The Company would ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

- (e) The Company shall render appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities, if any.
- (f) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- (g) The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website, in order to ensure official confirmation and documentation of disclosures made.
- (h) The Company shall handle all Unpublished Price Sensitive Information on a need-to-know basis.

LEGITIMATE PURPOSE

The Unpublished price sensitive information can be shared as an exception by an Insider for Legitimate purposes as per its "Policy for determination of Legitimate Purposes", as appended below provided it is not shared to evade or circumvent the prohibition under this Regulation.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

[Pursuant to Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018]

PREFACE

This Policy, as a part of "Codes of Fair Disclosure and Conduct" formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy".

This Policy is formulated in compliance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

OBJECTIVE

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as exception for the purpose of procuring unpublished price sensitive information (UPSI) relating to the Company or its listed securities or proposed to be listed securities, if any.

"**Legitimate Purposes**" include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers,

suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.”

Any person/party in possession of Unpublished Price Sensitive Information (UPSI) shall be deemed to be an “insider” for the purpose of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and such person/party would also be required to ensure the confidentiality of the said information as shared with them in compliance with the said regulations.

DIGITALDATABASE

The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities, as the case may be, with whom Unpublished Price Sensitive Information (UPSI) is shared under Regulation 3 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Such database shall be maintained with adequate internal controls and checks, such as time stamping, audit trails, etc. to ensure non-tampering of the database.

AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

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