

Jenburkt Pharmaceuticals Limited

CIN: L24230MH1985PLC036541

**Code of Practices and Procedures for Fair
Disclosure of Unpublished Price Sensitive
Information (UPSI).**

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

I. Introduction:

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Jenburkt Pharmaceuticals Ltd. (Jenburkt). This Code is in pursuance to and is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time. (SEBI – PIT)

II. Principles of Fair Disclosure:

The Principles of Fair Disclosure and conduct adopted by Jenburkt are as stated below:

- A.** To promptly make public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery of the securities of the Company. In case of major events, such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
- B.** Disclosures of UPSI will be made, as and when to be, in a universal and uniform manner.
- C.** Jenburkt’s Chief Financial Officer (CFO) or Company Secretary shall serve as its chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
- D.** To promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- E.** To provide appropriate and fair response to queries /requests for verification of regulatory authorities on news reports market rumours concerning UPSI.
- F.** To ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
- G.** To publish proceedings of meetings with analysts and of other investor relations conferences, if any, on its official website www.jenburkt.com to ensure official confirmation and documentation of disclosures made therein.
- H.** To handle all UPSI on a need-to-know basis only.



- I. Legitimate purposes: In pursuance of Regulation 3 (2) of SEBI - PIT, as amended, the insiders are prohibited to communicate or cause to do so, provide, procure or allow access to any UPSI, to any person including other insiders, but as an exception to those principles, such communication, procurement, permission to access, etc. is required to be shared for furtherance of legitimate purposes, performance of duties and discharge of legal obligation, in the ordinary course of business at arm’s length, 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 prohibition of this code and SEBI – PIT.

However, the person receiving such information for legitimate purpose, shall be treated as “insider” under this code and a notice, shall be given to such person, to maintain confidentiality of the shared information as UPSI.

III. Words and Expressions

- i) Any words or expression used in this code but not defined herein shall have the same meaning as described to it in the Companies Act, 2013 or Rules made thereunder, Securities & Exchange Board of India Act or Rules and Regulations made thereunder, SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and or any other relevant legislation/law applicable to the Company, as amended from time to time and the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996).
- ii) In any circumstance where the terms of this code differ from any law, for the time being in force, the law shall take precedence over this code.

IV. Right to Amend:

The Company reserves its right to amend or modify this code, as and when required under any applicable law or when found necessary or as and when considered fit, without assigning any reason whatsoever.

***** **End** *****

