



**JAYSYNTH**

**JAYSYNTH ORGOCHEM LIMITED**

**POLICY FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE  
SENSITIVE INFORMATION  
OR SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE  
INFORMATION**

## 1. BACKGROUND

Regulation 9A of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended (“SEBI PIT Regulations”) mandates every listed company to formulate a written policy and procedures for inquiry in case of leak of unpublished price sensitive information (“UPSI”) or suspected leak of unpublished price sensitive information and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information and inform SEBI promptly of such leaks, inquiries and results of such inquiries.

## 2. SCOPE

This Policy deals with-

- Formulating procedures for inquiry such as initiating inquiry, reporting, etc. in case of leak or suspected leak of UPSI.
- Strengthening the internal control system to prevent leak of UPSI.
- Penalizing any insider who appears to have found guilty of violating this policy.

## 3. DEFINITIONS

“**Code**” means the Jaysynth Orgochem Limited Code of Conduct for Prevention of Insider Trading and Code of Corporate Disclosure Practices.

“**Compliance Officer**” means any senior officer, designated so and reporting to the Board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be;

“**Leak of UPSI**” shall mean communication of information which is/shall be UPSI by any insider, Employee and Designated Persons or any other known or unknown person to any person other than a person(s) authorized by the Board after following the due process prescribed in this behalf in the Code of Practices for Fair Disclosure of the Company and/or under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or the SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

“**Unpublished price sensitive information or UPSI**” means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- changes in key managerial personnel.

#### **4. DUTIES OF COMPLIANCE OFFICER**

The Compliance Officer shall be responsible to;

- Oversee the Compliance of this policy.
- Report the incident of actual or suspected leak of UPSI to the Securities and Exchange Board of India.
- Intimate the incident of actual or suspected leak of UPSI to the Stock Exchanges.
- To co-ordinate with and disclose the relevant facts of the incident of actual or suspected leak of UPSI to the Enquiry committee.

#### **5. DISCLOSURE OF ACTUAL OR SUSPECTED LEAK OF UPSI TO STOCK EXCHANGE**

On becoming aware of actual or suspected leak of UPSI of the Company, the Compliance Officer shall ensure that the same shall be promptly intimated to the Stock Exchanges on which the securities of the Company is listed in the format as set out in “**Annexure A**” to this policy.

#### **6. REPORT OF ACTUAL OR SUSPECTED LEAK OF UPSI TO SEBI**

On becoming aware of actual or suspected leak of UPSI of the Company, the Compliance Officer shall ensure that a report on such actual or suspected leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly made to the SEBI in the format as set out in “**Annexure B**” to this policy.

#### **7. COMPOSITION OF THE INQUIRY COMMITTEE**

The Inquiry Committee shall consist of minimum 3 (three) Members which shall include the following:

- a. Managing Director,
- b. Chief Financial Officer,
- c. Company Secretary and
- d. any other employee of the Company or its subsidiaries as may be mutually decided by a, b and c above.

#### **8. DUTIES OF INQUIRY COMMITTEE**

The Inquiry Committee shall be responsible:-

- a. To conduct a preliminary enquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI, if any;
- b. To authorize any person to collect necessary support material; and
- c. To decide disciplinary action thereon.

#### **9. PROCEDURE FOR INQUIRY IN CASE OF LEAK OR SUSPECTED LEAK OF UPSI**

On becoming aware of suo-moto or otherwise, of actual or suspected leak of UPSI of the Company by any Promoter, Promoter Group, Director, Key Managerial Personnel, Insider, Employee, Designated Person, support staff or any other known or unknown person, the Compliance Officer after informing the same to the Chairman or Managing Director of the Company, shall follow the below mentioned procedure in order to enquire and/or investigate the matter -:

##### **a) Report to the Inquiry Committee**

The Compliance Officer shall report the information relating to actual or suspected leak of unpublished price sensitive information to the Inquiry Committee with all the available data, material substance, documents, facts, etc.

**b) Inquiry by the Committee**

Inquiry is a fact-finding exercise. The object of the inquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect material in support of the allegations, and thereafter to decide whether there is justification to embark on any disciplinary action.

The Inquiry Committee shall appoint and/or authorize any person(s), as it may deem fit, to assist in collecting the relevant facts, material substances on actual or suspected leak of UPSI.

The Committee will also give an opportunity to explain to the person who has suspected to have leaked the UPSI.

**c) Report of the Inquiry Committee:**

The Committee shall give its final report within 30 days from the date on which the matter is referred to the Committee or such other reasonable time. The report shall clearly mention, whether a leakage of UPSI has occurred or not and if occurred the proposed disciplinary action against the violator.

**d) Disciplinary Action**

The Disciplinary action(s) shall include, suspension, recovery, termination of employment/contract/agreement etc., as may be decided by the Committee.

**10. AMENDMENT**

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

**11. APPROVE AND ADOPTED**

This policy has been approve and adopted by the Board of Directors of the Company at their meeting held on 29<sup>th</sup> August, 2024.

**Annexure A**

**FORMAT FOR INTIMATION OF ACTUAL OR SUSPECTED LEAK OF UPSI TO THE  
STOCK EXCHANGES**

**Date:**

**BSE Limited**

Corporate Relationship Department  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai- 400 001

**Scrip Code:** 506910

Dear Sir / Madam,

**Sub: Intimation of actual or suspected leak of UPSI pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Pursuant to Regulation 30 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of Offender, if known	
Name of Organization	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Decision of the Inquiry Committee	
Disciplinary Action Taken by the Company	

Request you to kindly take the aforementioned on your records.

Thanking you,

Yours faithfully,

**For Jaysynth Orgochem Limited**

**Company Secretary**

**Annexure B**

**FORMAT FOR REPORTING ACTUAL OR SUSPECTED LEAK OF UPSI TO THE SEBI**

**Date:**

**Securities and Exchange Board of India**

Plot No. C 4-A, G Block, Near Bank of India,  
Bandra Kurla Complex,  
Bandra East, Mumbai – 400 051

**Scrip Code:** 506910

Dear Sir / Madam,

**Sub: Report of actual or suspected leak of UPSI pursuant to regulation 9A (5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015**

Pursuant to Regulation 9A of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of Offender, if known	
Name of Organization	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Decision of the Inquiry Committee	
Disciplinary Action Taken by the Company	

Request you to kindly take the aforementioned on your records.

Thanking you,

Yours faithfully,

**For Jaysynth Orgochem Limited**

**Company Secretary**