



JAGSONPAL PHARMACEUTICALS LIMITED

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JAGSONPAL PHARMACEUTICALS LTD. CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION.

1. Corporate Disclosure Policy

- 1.1. The following is the Corporate Disclosure Policy/norm to be followed by Jagsonpal Pharmaceuticals Limited. ("Company") to ensure timely and adequate disclosure of price sensitive information.
- 1.2. For the purpose of this Code Unpublished Price Sensitive Information ("UPSI") shall mean and include such matters as may be specified under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment thereto from time to time (hereinafter referred to as "Regulations").
- 1.3. This Code shall be applicable and binding on all the persons as defined under the regulations which shall include employees, officers, directors and those persons authorized to speak on behalf of the Company.

2. Prompt disclosure of price sensitive information

- 2.1. Disclosure of UPSI would be done promptly when credible and concrete information is available for making the same generally available;
- 2.2. The company will endeavour to make uniform and universal dissemination of UPSI and will avoid making selective disclosure once the information is ready to be made generally available. Material events will be disseminated as mandated by the stock exchanges in Clause 36 of the Listing Agreement as amended from time to time.
- 2.3. In case the Company is required to make selective disclosure of UPSI, then the information will be promptly disseminated either in the form of notification to stock exchanges, press releases or upload of information on the website of the Company.
- 2.4. UPSI handling will be on a selective need to know basis for legitimate purposes only.
- 2.5. The information released to stock exchanges will also be placed on the website of the Company for improving investor access to such public announcements.

3. Overseeing and co-ordinating disclosure

- 3.1. The Chairman & Managing Director (CMD), or the Company Secretary, being the person who is designated as the Compliance Officer to oversee corporate disclosure will be the Compliance Officer (CO) to deal with dissemination of information and disclosure of UPSI.
- 3.2. The CMD or CO shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media, and educating staff on disclosure policies and procedure.
- 3.3. Information disclosure/dissemination may normally be approved in advance by the CMD or CO.

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