



**Code of Fair Disclosure of
C.J. GELATINE PRODUCTS LIMITED
Under
SEBI (Prohibition of Insider Trading)
Regulations, 2015**



Code of Practices for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Background:

Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 mandates every Listed Company to formulate a “**Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information**” (hereinafter referred to as the ‘**Code**’) in adherence to the principles set out in Schedule A to the said Regulations and publish it on Company’s official website. This Policy is intended to lay down the principles and practices to be followed by **C.J. Gelatine Products Limited** (“CJGPL”) pertaining to disclosure of UPSI. The Company intends to follow best practices, duly compliant with Applicable Law, in the matter of disclosure of UPSI. Accordingly, the following Code in supersession of the previous Code was adopted by the Board of Directors of CJGPL at its meeting held on 6th February, 2021 and the revised Code shall be effective from **1st April, 2021**.

SCOPE

The Company endeavours to preserve the confidentiality of un-published price sensitive information (**UPSI**) and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Principles of Fair Disclosure of Unpublished Price Sensitive information

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

- ❖ The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such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.
- ❖ The Company will make uniform and universal dissemination of unpublished price sensitive information.
- ❖ The CFO & CS of the Company shall act as the Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information unless otherwise decided by the Board of Directors.

- ❖ The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- ❖ The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- ❖ The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- ❖ The Company will develop best practices to make 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.
- ❖ The Company will handle all unpublished price sensitive information on a need-to-know basis.

SHARING OF PRICE SENSITIVE INFORMATION PURSUANT TO LEGITIMATE PURPOSE

Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, shall be considered as “Legitimate Purpose” for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations. Any person in receipt of unpublished price sensitive information pursuant to a “Legitimate Purpose” shall be considered an “insider” for purposes of SEBI (Prohibition of Insider Trading) Regulations, 2015 and such persons are also required to ensure and maintain the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

MAINTENANCE OF DIGITAL DATABASE

A structured digital database shall be maintained by Company containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law Where Permanent Account Number is not available.

APPLICABILITY

This Code shall be applicable with effect from April 1, 2021.

AMENDMENTS

The Board of Directors shall amend the code, as may be required to be in line with the changes, amendments and modifications if any in the SEBI (Prohibition of Insider Trading) Regulations, 2015. Further, in case of any amendment, clarification, circular, notification etc. issued by a competent authority, which is not consistent with the provisions laid down under this code, the provisions of such amendment, clarification, circular, notification, etc. shall prevail and this code shall stand amended accordingly, without any further action, on and from the date on which such amendment, clarification, circular, notification comes into effect.

HOSTING OF THE CODE

This Code shall be hosted on the website of the Company.