



JAYSYNTH DYESTUFF (INDIA) LIMITED

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

1. PREFACE

This Policy as part of “Codes of Fair Disclosure and Conduct” formulated under Regulation 8 of the 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 prepared in accordance with Regulation 3(2A) of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

2. APPLICABILITY

This Policy shall be applicable with effect from 01st April, 2019.

3. OBJECTIVE

The objective of the policy is to identify the “Legitimate Purposes”, which will be considered as exception for the purpose of procuring Unpublished Price Sensitive Information (UPSI) relating to the Company.

4. LEGITIMATE PURPOSES

Legitimate Purposes shall mean sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

- Promoters of the Company
- Partners
- Collaborators
- Lenders
- Customers
- Suppliers
- Merchant Bankers
- Legal Advisors
- Auditors (Statutory, Internal, Secretarial, GST and any other Auditor as applicable)
- Insolvency Professionals
- Consultants
- Any other advisors/consultants/partners

It is hereby clarified that any person in receipt of UPSI pursuant to a “Legitimate Purposes” shall also be considered as an “Insider” for the purpose of this code, the Insider Trading Policy and Regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations.

5. 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.

6. APPROVE AND ADOPTED

This policy has been approve and adopted by the Board of Directors of the Company through Circular Resolution passed on 29th March, 2019.