

JYOTI STRUCTURES LIMITED



Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(as amended w.e.f February, 2024)

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Corporate Disclosure Policy

The Company shall appoint a senior officer as the Chief Investor Relations Officer, responsible for ensuring timely, adequate, uniform, and universal dissemination of information, including the disclosure of Unpublished Price Sensitive Information (UPSI), in accordance with this Code as required by the regulations.

The Chief Investor Relations Officer shall have the following responsibilities:

- Overseeing and co-ordinating disclosure of UPSI to stock exchanges, analysts, shareholders, and media.
- Handling all the UPSI on a need-to-know basis.

Responding to market rumours

The Chief Investor Relations Officer will address all matters pertaining to market rumours received from the stock exchanges, the press, media, or other sources, in consultation with the Whole-Time Director.

Timely Reporting of shareholdings/ownership and changes in ownership

The Compliance Officer shall be responsible for ensuring that disclosures of shareholders and changes in ownership, as required under the Stock Exchange Listing Agreements and/or any rules/regulations under the Securities & Exchange Board of India Act, 1992, are made promptly and adequately.

Disclosure/Dissemination of UPSI with Special Reference to Analysts, Institutional Investors

No person, except the Chief Investor Relations Officer or any other person authorized by the Board, shall disclose any information relating to the Company's securities to analysts, institutional investors, and research personnel. The Chief Investor Relations Officer or the authorized person, as applicable, shall be invited to meetings and conferences organized by the Company with the analysts, institutional investors, or research personnel.

The Company should adhere to the following guidelines when dealing with analysts institutional investors, or research personnel:

- i. **Only Public information to be provided:** The Company shall provide only public information to the analysts, institutional investors, or research personnel. Alternatively, the information given to the analysts should be simultaneously made public at the earliest.
- ii. **Recording of Discussion:** All the analyst, broker, or institutional investor meetings shall be attended by the Chief Investor Relations Officer or the authorized person, possibly accompanied by any other senior employee of the Company. To avoid misquoting or misrepresentation, the Chief Investor Relations Officer can make transcripts or arrange for recording discussions at the meeting.
- iii. **Simultaneous Release of Information:** When the Company organizes meetings with analysts, institutional investors, or research personnel, it shall issue a press release or post relevant information on its website after each meeting. The Company may also consider live webcasting of analyst meets.

Medium of disclosure/dissemination

The Company shall disseminate all UPSI continuously and promptly to stock exchanges where its securities are listed and subsequently to the press.

As a good corporate practice, the UPSI disclosed to the Stock Exchanges and to the press may also be supplemented by prompt updates on the Company's website. The Company may also consider other modes of public disclosure of UPSI to improve investor access.

The information filed by the Company with the Stock Exchanges under the Stock Exchange Listing Agreement shall also be posted on the Company's website.