SIGMA SUPER WIRES & CABLES

AN ISO 9001: 2015 CERTIFIED COMPANY

JIGAR CABLES LIMITED
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Dist. Rajkot, (Gujarat) INDIA Tel: + 91 2825 221422
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CIN No.L28999GJ2017PLC095651

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

1. Introduction

In consonance with the principles of fair disclosure prescribed under Regulation 8(1) read with Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations"), as amended from time to time, JIGAR CABLES LIMITED ("the Company") had adopted the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("the Code" or "Code of Fair Disclosure").

The Code has been formulated to ensure the timely, adequate, fair and uniform disclosure of Unpublished Price Sensitive Information ("UPSI") relating to the Company and/or its securities, with a view to maintaining transparency and upholding the integrity of the securities market.

The Company endeavours to preserve the confidentiality of UPSI and prevent its misuse. In view of amendments to the SEBI PIT Regulations and the need to align the Code with applicable regulatory requirements, the Company has reviewed and revised the existing Code.

The revised Code is adopted in supersession of the earlier version and shall come into effect from the date of its approval by the Board of Directors of the Company. The Code shall be reviewed and amended from time to time, as may be necessary, to ensure continued compliance with applicable laws and regulatory requirements.

2. Definitions:

For the purpose of this code the following terms shall have the meanings assigned to them hereunder:

i. "Act" means the Securities and Exchange Board of India Act, 1992;

ii. "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media

iii. "Insider" means any person who is:
i) a connected person; or ii) in possession of or having access to Unpublished Price Sensitive Information;

iv. "Unpublished Price Sensitive Information" or "UPSI" shall have the same meaning as mentioned in the SEBI PIT Regulations Other terms not specifically defined here shall have the same meaning as assigned under the Company's Code

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of Conduct for prevention of insider trading in securities of JCL and the SEBI PIT Regulations.

The provisions of this Code have to be read along and in conjunction with the Company's Code of Conduct for prevention of insider trading in securities of JCL, Policy for procedure of inquiry in case of leak of UPSI and the SEBI PIT Regulations and if there is any inconsistency/contradiction therein, the provisions of the SEBI PIT Regulations shall prevail.

3. 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:

1. 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.

2. The Company shall endeavor to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

3. The Company Secretary of the Company shall act as the Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. The Company shall take reasonable steps, to make generally available, any discussion on un-published price sensitive information at the meeting of analyst or investors relations through the official website to ensure official confirmation and indiscriminate disclosure.

8. The Company will handle all unpublished price sensitive information on a "need to know" basis, i.e. Unpublished Price Sensitive Information shall be disclosed only to those within the Company who need the information to discharge their duty.

9. This Code shall be published on the website (www.sigmacab.com) of the Company. Further, this Code and every subsequent amendment made thereto shall be promptly

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intimated to the Stock Exchange where the securities of the Company are listed and will be updated on Company's website.

4. Overseeing and co-ordinating disclosure

1. The Company shall designate a Compliance Officer as a Chief Investor Relations Officer ("CIRO") to deal with dissemination and disclosure of UPSI.

2. The CIRO would be responsible to ensure timely, adequate, uniform and universal dissemination and disclosure of UPSI pursuant to this Code as required under the Insider Trading Regulations so as to avoid selective disclosure.

3. The CIRO shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of UPSI to Stock Exchange(s) where JCL Securities are listed, analysts, shareholders and media, and educating employees on disclosure policies and procedures.

4. Disclosure/dissemination of UPSI may normally be approved in advance by CIRO. Incase of doubt, the CIRO shall consult and seek approval of the Chairman/ Managing Director / Chief Financial Officer, if any, constituted by the Board of Directors of the Company pursuant to the Listing Regulations, before dissemination of such information.

5. If UPSI is accidentally disclosed without prior approval of CIRO, the person responsible shall inform the CIRO immediately. The CIRO will then promptly disseminate the information so as to make such information generally available.

5. Responding to market rumours

The CIRO shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure, if required. He may consult the Chairman/ Managing Director/ Chief Financial Officer, if any, constituted by the Board of Directors of the Company under the Listing Regulations and thereafter make appropriate disclosures.

6. Disclosure/dissemination of Price Sensitive Information with special reference to Analysts, Research Personnel, Institutional Investors

No person, except those authorized by the CIRO, shall disclose any information relating to the Company's Securities to analysts, research personnel and institutional investors. All Directors and Employees of the Company should follow the guidelines given hereunder while dealing with analysts, research personnel and institutional investors:

i. **Only Public information to be provided:** The Company shall provide only public information to the analyst/research personnel/large investors like institutions. The CIRO

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shall ensure that information shared with them is not UPSI. The information given to the analyst should be made public at the earliest.

ii. **Recording of discussion and Simultaneous release of Information:** In order to avoid misquoting or misrepresentation, it is desirable that a Company representative be present at meetings with analysts, brokers or institutional investors and discussions should preferably be recorded. When a Company organizes meetings with analysts and other investor relations conferences, the CIRO will ensure that the transcripts or records of proceedings of meetings with analysts and other investor relations conferences are posted on the official website of the Company, to ensure official confirmation and documentation of disclosures made.

iii. **Handling of unanticipated questions:** The Company should be careful when dealing with Analysts questions that raise issues outside the intended scope of discussion. Unanticipated questions may be noted and a considered response given later. If the answer includes price sensitive information, then it should be made generally available before responding.

7. **Medium of disclosure/dissemination**

1. The Company shall ensure prompt disclosure of information to the stock exchange(s) where the securities of JCL are listed.

2. Disclosure and dissemination of information may be carried out through various media channels to ensure wide and timely reach.

3. The Company may also utilize its official website as a platform for disseminating information.

4. Information submitted by the Company to the stock exchange(s) under the continuous disclosure requirements may also be made available on the Company's website for easy public access.

8. Review of Code and Amendments thereof

The Board may review the code from time to times, as may be necessary, and may amend / substitute any provision(s) with a new provision(s) or replace this entire Code with a new Code. Any amendment(s) in the statutory/regulatory requirements shall be binding even if not incorporated in this Code.