

JAYASWAL NECO INDUSTRIES LTD

CIN : L28920MH1972PLC016154

(FORMERLY JAYASWALS NECO LIMITED)

REGD. OFFICE : F-8, MIDC INDUSTRIAL AREA, HINGNA ROAD, NAGPUR - 440 016 (INDIA)

PHONES : +91-7104-237276, 237471, 237472, 237461, 237462, 236253, 236254, 236256

FAX : +91-7104-237583, 236255 • E-mail : contact@necoindia.com • Website : www.necoindia.com



19th August, 2023

To

National Stock Exchange of India Limited

Scrip Symbol: JAYNECOIND

BSE Limited

Scrip code: 522285

Through: NEAPS

Through: BSE Listing Centre

Dear Sir/ Madam,

Subject: Reporting Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

We hereby inform you that the designated persons of the Company have traded in the equity shares of the Company during the period of closure of trading window in violation of the Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Pursuant to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed herewith the Report (in prescribed format) covering the details of violation of the Company's code of conduct by the Designated Persons along with the action taken by the Company thereon.

This is for your kind information and record.

Thanking you,

Yours faithfully,

For JAYASWAL NECO INDUSTRIES LIMITED

Ashish

Ashish Srivastava

Company Secretary & Compliance Officer

Membership No. A20141



BRANCH OFFICES :

"NECO HOUSE" D-307, Defence Colony,
NEW DELHI - 110 024. (INDIA)
PHONES : 011-49070548

301, TULSIANI CHAMBERS
NARIMAN POINT, MUMBAI 400 021 (INDIA)
P.H. : (022) 4213-4813,
(022) : 22832381 FAX : (022) 22832367

TRUST HOUSE, 5th FLOOR,
32-A, CHITTARANJAN AVENUE,
KOLKATTA - 700012 INDIA FAX : 033-22122560
PHONES: 033-22122368. 22120502

THANOD ROAD, ANJORA-491001.
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Report by Jayaswal Neco Industries Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details																
1	Name of the Listed Company	Jayaswal Neco Industries Limited																
2	Please tick appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company																
3	A. Details of Designated Person (DP)																	
	i. Name of the DP	Shri Arun Kumar Gupta																
	ii. PAN of the DP	ACAPG5802E																
	iii. Designation of DP	Vice President-Metal Mines (Resigned on 5 th August, 2023 from the Company)																
	iv. Functional Role of DP	Vice President-Metal Mines (Resigned on 5 th August, 2023 from the Company)																
	v. Whether DP is Promoter or belongs to Promoter Group	No																
	B. If Reporting is for immediate relative of DP																	
	i. Name of the immediate relative of DP	NA																
	ii. PAN of the immediate relative of DP	NA																
	C. Details of transaction(s)																	
	i. Name of the scrip	Jayaswal Neco Industries Ltd. BSE Code: 522285 NSE Symbol: JAYNECOIND																
	ii. No. of Shares traded and value (Rs.) (Date-wise)	<table border="1"><thead><tr><th>Date</th><th>Nature of Trans.</th><th>No. of Shares</th><th>Value (Rs.)</th></tr></thead><tbody><tr><td>12th July, 2023</td><td>Buy</td><td>4000</td><td>91,200</td></tr><tr><td>17th July, 2023</td><td>Buy</td><td>9000</td><td>2,15,995</td></tr><tr><td>17th July, 2023</td><td>Sell</td><td>18000*</td><td>4,38,750</td></tr></tbody></table> <p>Profit earned: Rs.14,219/-* * Sale of 18000 Shares includes 5000 shares bought before the closure of trading window and profit is calculated based on the buying cost of all the 18000 Shares.</p>	Date	Nature of Trans.	No. of Shares	Value (Rs.)	12 th July, 2023	Buy	4000	91,200	17 th July, 2023	Buy	9000	2,15,995	17 th July, 2023	Sell	18000*	4,38,750
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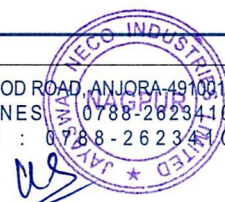
BRANCH OFFICES :

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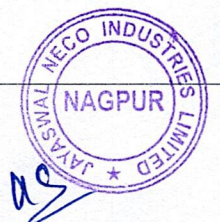
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	D. In case value of trade(s) is more than Rs.10 Lakhs in a calendar quarter.													
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015.	NA												
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015.	NA												
4	Details of violations observed under Code of Conduct	Violation of para(clause) 6 of the Code of Conduct. Trading during Window closure and execution of Contra Trade												
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>i. Sought explanation in writing to be placed before the Audit Committee and Board of Directors of the Company.</p> <p>ii. The Audit Committee and Board of Directors at their Meeting held on 14th August, 2023 imposed a penalty of Rs. 5,000/- in addition to the recovery of profit earned i.e. Rs. 14,219/- from the transactions and directed to deposit the total amount of Rs.19,219/- to the Govt. authorised Fund i.e. Investor Protection and Education Fund (IPEF) administered by the SEBI.</p> <p>iii. The Designated Person has been warned to abstain himself including relatives for trading during the period of Trading Window Closure and abide by the Code for dealing in shares of the Company at any time in future.</p>												
6	Reasons recorded in writing for taking action stated above	Violation of para(clause) 6 of the Code of Conduct (Trading during closure of Trading Window and Contra Trade).												
7	Details of the previous instances of violations, if any, since last financial year	NA												
8	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)	Online												
	ii. Details of transfer/payment In case of Online <table border="1" data-bbox="215 1729 1286 1975"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Shri Arun Kumar Gupta</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>SBI, Tamnar, Raigarh (CG) A/c No. 00000020079303629</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>IRW8191156</td> </tr> <tr> <td>Transaction date</td> <td>17th August, 2023</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs.19,219/-</td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	Shri Arun Kumar Gupta	Bank Name, branch and Account number	SBI, Tamnar, Raigarh (CG) A/c No. 00000020079303629	UTR/Transaction reference Number	IRW8191156	Transaction date	17 th August, 2023	Transaction Amount (in Rs.)	Rs.19,219/-
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In case of Demand Draft (DD): Not Applicable		
	Particulars	Details
	Bank Name and Branch	--
	DD Number	--
	DD date	--
	DD amount (in Rs.)	--
9	Any other relevant information	NA

Yours faithfully,

For Jayaswal Neco Industries Limited

Ashish

Ashish Srivastava
 Company Secretary & Compliance Officer
 Membership No. A20141
 PAN: BJNPS6186E
 Email ID: ashish.srivastava@necoindia.com



Place : Nagpur

Date : 19th August, 2023

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	ii. PAN of the DP	AEOPS2031K																
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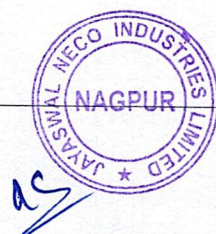
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9	Any other relevant information	NA
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Yours faithfully,

For Jayaswal Neco Industries Limited

Ashish

Ashish Srivastava
Company Secretary & Compliance Officer
Membership No. A20141
PAN: BJNPS6186E
Email ID: ashish.srivastava@necoindia.com



Place : Nagpur

Date : 19th August, 2023