

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



12th June, 2024

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 person of the Company has traded in the equity shares of the Company 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 Person 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 Srivastava
Company Secretary & Compliance Officer
Membership No. A20141



BRANCH OFFICES :

"NECO HOUSE" D-307, Defence Colony,
NEW DELHI - 110 024. (INDIA)
PHONES : 0 11 - 4 9 0 7 0 5 4 8

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.
PHONES : 0788-2623410
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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 Rajkamal Srivastava | | | | | | | | | | | | | | | | | | | | |
| | ii. PAN of the DP | AEOPS2031K | | | | | | | | | | | | | | | | | | | | |
| | iii. Designation of DP | President-Material | | | | | | | | | | | | | | | | | | | | |
| | iv. Functional Role of DP | President-Material | | | | | | | | | | | | | | | | | | | | |
| | 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>29th February, 2024</td><td>Buy</td><td>10,000</td><td>5,25,000</td></tr><tr><td>1st March, 2024</td><td>Sell</td><td>10,000</td><td>5,54,000*</td></tr><tr><td>6th March, 2024</td><td>Buy</td><td>20,000</td><td>10,32,600</td></tr><tr><td>12th March, 2024</td><td>Buy</td><td>10,000</td><td>4,81,500</td></tr></tbody></table> <p>Profit earned: Rs.29,000/-*</p> | Date | Nature of Trans. | No. of Shares | Value (Rs.) | 29 th February, 2024 | Buy | 10,000 | 5,25,000 | 1 st March, 2024 | Sell | 10,000 | 5,54,000* | 6 th March, 2024 | Buy | 20,000 | 10,32,600 | 12 th March, 2024 | Buy | 10,000 | 4,81,500 |
| Date | Nature of Trans. | No. of Shares | Value (Rs.) | | | | | | | | | | | | | | | | | | | |
| 29 th February, 2024 | Buy | 10,000 | 5,25,000 | | | | | | | | | | | | | | | | | | | |
| 1 st March, 2024 | Sell | 10,000 | 5,54,000* | | | | | | | | | | | | | | | | | | | |
| 6 th March, 2024 | Buy | 20,000 | 10,32,600 | | | | | | | | | | | | | | | | | | | |
| 12 th March, 2024 | Buy | 10,000 | 4,81,500 | | | | | | | | | | | | | | | | | | | |

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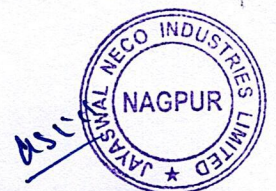
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| | D. In case value of trade(s) is more than Rs.10 Lakhs in a calendar quarter. | | | | | | | | | | | | | | | | | |
|-----------------------------|---|---|-------------|------------------|---------------|-------------|----------------------------|-----|-------|----------|-----------------------------|-----|-------|----------|-----------------------------|-----|-----|--------|
| | 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) 7 of the Code of Conduct. Trading in excess of threshold limit without obtaining the preclearance from the Compliance Officer of the Company and also 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 30th April, 2024 imposed a penalty of Rs. 25,000/- in addition to the recovery of profit earned i.e. Rs. 29,000/- from the transactions and directed to deposit the total amount of Rs.54,000/- 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. He has been strictly warned that if the same act happen again, strict action will be taken against him as per the Code of Conduct of the Company which may include wage freeze, suspension, recovery etc.</p> | | | | | | | | | | | | | | | | |
| 6 | Reasons recorded in writing for taking action stated above | Violation of para(clause) 7 of the Code of Conduct (Trading in excess of threshold limit without obtaining the preclearance from the Compliance Officer of the Company and also execution of contra-trade.) | | | | | | | | | | | | | | | | |
| 7 | Details of the previous instances of violations, if any, since last financial year | <p>Period of violation and transaction value:</p> <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>7th July, 2023</td> <td>Buy</td> <td>10000</td> <td>2,26,300</td> </tr> <tr> <td>10th July, 2023</td> <td>Buy</td> <td>17158</td> <td>3,92,403</td> </tr> <tr> <td>12th July, 2023</td> <td>Buy</td> <td>450</td> <td>10,237</td> </tr> </tbody> </table> | Date | Nature of Trans. | No. of Shares | Value (Rs.) | 7 th July, 2023 | Buy | 10000 | 2,26,300 | 10 th July, 2023 | Buy | 17158 | 3,92,403 | 12 th July, 2023 | Buy | 450 | 10,237 |
| Date | Nature of Trans. | No. of Shares | Value (Rs.) | | | | | | | | | | | | | | | |
| 7 th July, 2023 | Buy | 10000 | 2,26,300 | | | | | | | | | | | | | | | |
| 10 th July, 2023 | Buy | 17158 | 3,92,403 | | | | | | | | | | | | | | | |
| 12 th July, 2023 | Buy | 450 | 10,237 | | | | | | | | | | | | | | | |



| | | Details of violations: Violation of para(clause) 6 of the Code of Conduct (Trading during closure of Trading Window) Action taken: Penalty of Rs.10,000/- was imposed. | | | | | | | | | | | | | | | | | | | | | | |
|--------------------------------------|---|---|-------------|---------|------------------------|--------------------------|--------------------------------------|---------------------------------|----------------------------------|-----------------|------------------|-----------------------------|-----------------------------|--------------|-------------|---------|----------------------|----|-----------|----|---------|----|--------------------|----|
| 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"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Shri Rajkamal Srivastava</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>Payment made through Debit Card</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>240520185527814</td> </tr> <tr> <td>Transaction date</td> <td>12th June, 2024</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs. 54,000/-</td> </tr> </tbody> </table> <p>In case of Demand Draft (DD): Not Applicable</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and Branch</td> <td>--</td> </tr> <tr> <td>DD Number</td> <td>--</td> </tr> <tr> <td>DD date</td> <td>--</td> </tr> <tr> <td>DD amount (in Rs.)</td> <td>--</td> </tr> </tbody> </table> | | Particulars | Details | Name of the transferor | Shri Rajkamal Srivastava | Bank Name, branch and Account number | Payment made through Debit Card | UTR/Transaction reference Number | 240520185527814 | Transaction date | 12 th June, 2024 | Transaction Amount (in Rs.) | Rs. 54,000/- | Particulars | Details | Bank Name and Branch | -- | DD Number | -- | DD date | -- | DD amount (in Rs.) | -- |
| Particulars | Details | | | | | | | | | | | | | | | | | | | | | | | |
| Name of the transferor | Shri Rajkamal Srivastava | | | | | | | | | | | | | | | | | | | | | | | |
| Bank Name, branch and Account number | Payment made through Debit Card | | | | | | | | | | | | | | | | | | | | | | | |
| UTR/Transaction reference Number | 240520185527814 | | | | | | | | | | | | | | | | | | | | | | | |
| Transaction date | 12 th June, 2024 | | | | | | | | | | | | | | | | | | | | | | | |
| Transaction Amount (in Rs.) | Rs. 54,000/- | | | | | | | | | | | | | | | | | | | | | | | |
| 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 Srivastava
 Company Secretary & Compliance Officer
 Membership No. A20141
 PAN: BJNPS6186E
 Email ID: ashish.srivastava@necoindia.com



Place : Nagpur
 Date : 12th June, 2024