

S.J.S. Enterprises Limited

Sy. No 28/P16 of Agra Village and Sy No 85/P6  
of B.M. Kaval Village, Kengeri Hobli,  
Bangalore-560082.  
P: +91 80 61940777 F: +91 80 28425110  
Email: info@sjsindia.com, compliance@sjsindia.com

ISO 14001 ISO 45001  
ISO 9001 IATF 16949  
Certified  
CIN: L51909KA2005PLC036601  
www.sjsindia.com



May 16, 2025

To,

<b>National Stock Exchange of India Limited</b> Exchange Plaza, 5 <sup>th</sup> Floor, Plot No. C/1, G Block, Bandra – Kurla Complex, Bandra (E), Mumbai -400 051  <b>Symbol: SJS</b>	<b>BSE Limited</b> Corporate Relationship Department, 2 <sup>nd</sup> Floor, New Trading Wing, Rotunda Building, P.J. Towers, Dalal Street, Mumbai – 400 001  <b>Scrip Code: 543387</b>
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**ISIN: INE284S01014**

Dear Sir/Madam,

**Sub: Reporting of violation under the Code of Conduct to Regulate, Monitor and Report Trading by Insiders' of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015**

**Re.: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23<sup>rd</sup> July, 2020**

This is with reference to our letter dated April 26, 2025, wherein we had informed about a violation of the Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders, in accordance with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, by a designated person of the Company.

Please find enclosed the report on the action taken by the Company in connection with the said violation, submitted in the format prescribed under SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23<sup>rd</sup> July, 2020.

We request you to kindly take the above on record.

Thanking you,  
Yours faithfully,

**For S.J.S. Enterprises Limited**

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**Thabraz Hushain W.**  
**Company Secretary and Compliance Officer**  
**Membership No.: A51119**

**Encl.: as above**

## Report by S.J.S. Enterprises Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1	Name of the listed company	<i>S.J.S. Enterprises Limited</i>
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	<i>Listed Company</i>
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	<i>Mr. Ganesh Rajan V</i>
	ii. PAN of the DP	<i>AQ*****3N</i>
	iii. Designation of DP	<i>General Manager – Marketing &amp; Sales West Region</i>
	iv. Functional Role of DP	<i>Marketing</i>
	v. Whether DP is Promoter or belongs to Promoter Group	<i>No</i>
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	<i>Not Applicable</i>
	ii. PAN of the immediate relative of DP	<i>Not Applicable</i>
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	<i>BSE: 543387, NSE: SJS</i>
	ii. No of shares traded and value (Rs.) (Date-wise)	<i>Mr Ganesh Rajan on April 21, 2025 has sold 3250 Shares of the company at INR 936.70/-, amounting to INR 30,44,275/-.</i>  <i>These shares were allotted to him under the Company's ESOP Scheme.</i>
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	<i>April 24, 2025</i>
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	<i>Not Applicable</i>
4	Details of violations observed under Code of Conduct	<i>Mr. Ganesh Rajan has sold the 3250 shares of the Company, during the trading window closure period and also did not seek the mandatory pre-clearance from the Compliance Officer for trades exceeding</i>



		<i>INR 10 Lakhs, which is in violation of Clauses 7 &amp; 8 of the Company's Insider Trading Code.</i>
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p><i>The above breach of the Company's Code of Conduct and applicable regulatory obligations has been taken very seriously by the Company.</i></p> <p><i>The matter was placed before the Audit Committee, and after careful consideration, the Committee has resolved the following:</i></p> <ol style="list-style-type: none"> <li><i>1. A warning letter has been issued to the designated person, instructing him not to engage in any dealings in the equity shares of the Company in violation of the Company's Code of Conduct and the SEBI (Prohibition of Insider Trading) Regulations, 2015. and</i></li> <li><i>2. A penalty of Rs. 1,00,000/- (Rupees One Lakh only) has been imposed on the designated person, comprising the following:</i> <ul style="list-style-type: none"> <li><i>- Rs. 25,000/- for executing trades without seeking prior approval (pre-clearance); and</i></li> <li><i>- Rs. 75,000/- for executing trades during the trading window closure period.</i></li> </ul> </li> </ol> <p><i>The above penalty amount has been duly deposited with the SEBI – Investor Protection and Education Fund (SEBI-IPEF).</i></p> <p><i>Further, the designated person has been advised to treat this matter with utmost seriousness. Any future violation of the Company's Code of Conduct or SEBI regulations will attract stricter disciplinary action, which may include ineligibility for any issuance of future Employee Stock Options (ESOPs) etc. or any other action the company may deem fit.</i></p>
6	Reasons recorded in writing for taking action stated above	<i>Violation of Clauses 7 &amp; 8 of the Company's Insider Trading Code.</i>
7	Details of the previous instances of violations, if any, since last financial year	<i>None</i>
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	<i>Online</i>



ii. Details of transfer/payment:	
In case of Online:	
<b>Particulars</b>	<b>Details</b>
Name of the transferor	Ganesh Rajan V
Bank Name, branch and Account number	State Bank of India, Oragadam Chennai and 10228876496
UTR/Transaction reference Number	UTR/RRN: 513612526565
Transaction date	16-05-2025
Transaction Amount (in Rs.)	Rs. 1,00,000/-
In case of Demand Draft (DD):	
<b>Particulars</b>	<b>Details</b>
Bank name and Branch	
DD Number	
DD Date	
DD Amount (in Rs.)	
9	Any other relevant information Nil

Yours faithfully,  
For S.J.S. Enterprises Limited

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Thabraz Hushain W.  
Company Secretary and Compliance Officer  
Membership No.: A51119

**Date:** May 16, 2025

**Place:** Bengaluru