

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.

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ISO 14001 ISO 45001
ISO 9001 IATF 16949
Certified

CIN: L51909KA2005PLC036601

www.sjsindia.com



Creating Possibilities

May 17, 2025

To,

National Stock Exchange of India Limited Exchange Plaza, 5 th Floor, Plot No. C/1, G Block, Bandra – Kurla Complex, Bandra (E), Mumbai -400 051 Symbol: SJS	BSE Limited Corporate Relationship Department, 2 nd Floor, New Trading Wing, Rotunda Building, P.J. Towers, Dalal Street, Mumbai – 400 001 Scrip Code: 543387
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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 23rd July, 2020

This is with reference to our letter dated May 16, 2025, wherein we had informed about a violation of the Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders and we had submitted the report on the action taken by the Company in the format prescribed under SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July, 2020.

We are now enclosing the same report with the updated payment details of the Designated Person towards SEBI – IPEF.

We request you to kindly take the above on record.

Thanking you,
Yours faithfully,

For S.J.S. Enterprises Limited

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	A. Details of Designated Person (DP)	
	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 & 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. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	<i>Not Applicable</i>
	ii. PAN of the immediate relative of DP	<i>Not Applicable</i>
	C. Details of transaction(s)	
	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>
	D. In case value of trade(s) is more than Rs.10 lacs 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	<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 & 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"> <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> <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"> <i>- Rs. 25,000/- for executing trades without seeking prior approval (pre-clearance); and</i> <i>- Rs. 75,000/- for executing trades during the trading window closure period.</i> <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 & 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:

Particulars	Details
Name of the transferor	Ganesh Rajan V
Bank Name, branch and Account number	Kotak Mahindra, J.P. Nagar Bangalore and 4112768926
UTR/Transaction reference Number	250516228715991
Transaction date	16-05-2025
Transaction Amount (in Rs.)	Rs. 1,00,000/-

In case of Demand Draft (DD):

Particulars	Details
Bank name and Branch	
DD Number	
DD Date	
DD Amount (in Rs.)	

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Any other relevant information

Nil

Yours faithfully,

For S.J.S. Enterprises Limited

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

Date: May 16, 2025

Place: Bengaluru