

Insider Trading

As per The Securities and Exchange Board of India ([Prohibition of] Insider Trading) Regulations, 1992, we have formulated the internal code of conduct for Insider Trading as under:

1. In connection to the above, the company has formulated policy to identify the 'insider' as the defined in the act to identify at the time of account opening as under:
 - Any person who holds more than 5% shares or voting rights in any listed company shall disclose their interest in the company
 - Any person who is a director of a listed company, shall disclose their interest in the company
 - Any person who is – company under same management, intermediary, merchant banker, share transfer agent, registrar to an issue, debenture trustee, broker, portfolio manager, Investment Advisor, sub-broker, Investment company or an employee thereof, or, is a member of the board of Trustees of a mutual fund or a member of the Board of Directors of the Asset Management company of a mutual fund or is an employee thereof who has a fiduciary relationship with the listed company
 - Any person who is the relative of any of the above.

The company has set its internal system for keeping watch on such clients to prevent the insider trading upto the maximum extent.

2. Further, as referred to the clients in the para 1. above, and also for the other clients, company closely monitor the trades done by these clients. Any transactions made which are suspicious in nature are closely monitored by the surveillance department keeping in view the guidelines laid down by the SEBI with respect to Insider Trading Prohibition. Similarly, any transactions made with abnormal quantities are monitored.
3. The company further keeps close monitoring, on trading made in case of illiquid scripts. The company has set parameter in its risk management system wherein it has restricted trading the scripts which are either in T2T group or Z group or scripts traded with very negligible volumes etc.
4. In case of fulfillment of all of the above terms and conditions, the company remains highly precautions.

5. We have duly appointed a compliance officer for prevention of insider trading and compliance of the norms laid down by SEBI and for observance of such thin transactions made.
6. The company further to avoid suspicious transactions made through either modification or else, has kept check so that only genuine mistakes can be rectified through code modification mechanism only after prior approval of management / compliance officer

The company at present observe above said procedure for prevention of Insider Trading. We shall update our internal code of conduct keeping in view timely circulars, guidelines and instructions laid down by the regulatory authorities and in consultation with inspection authorities.