

### **“Code of conduct of Prevention of Insider Trading”**

1. No person shall directly or indirectly use or employ in connection with the issue of purchase or sale of any security listed or proposed to be listed in the recognized Stock Exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of SEBI or rules made there under.
2. All the persons shall maintain confidentiality of all price sensitive information & shall not pass such information directly or indirectly by way of making a recommendation for the purchase or sale of security.
3. Price sensitive information to be handled in the office on the “need to know” basis only. Any passing of the information to any another person should be with the written permission of the compliance officer.
4. Files containing confidential information shall be kept in secured files and premises & the computer files / files in electronic media shall be adequately secured by login or a password.
5. No person shall discuss, talk or communicate any price sensitive information to anyone in “public area”.
6. Any person shall not use price sensitive information for buying or selling of securities of any sort, whether for their own account or their relative’s account or organization’s account.
7. All persons who intend to deal in Client Company shall pre-clear the transactions as per procedure, described under the Regulation of SEBI.
8. All the persons shall execute their order within one week, after the approval of pre-clearance is given. If the order is not executed within one week after the approval, the pre-clearance is required once again.
9. Such persons shall hold their investment for minimum period of 30 days in order to be considered as held for Investment purpose.
10. All such persons shall be required to forward the details of security transaction including the statement of dependant family members in the format & within the time limit as prescribed under the regulations.
11. Any persons who trades in securities or communicates any information or counsels any person in trading in securities in contravention of code of conduct may be penalized & action may be taken under the SEBI Regulations.

12. In case of any observation regarding violation of code of conduct, the same shall be brought to the notice of Compliance officer or SEBI.

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