

## "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 thereunder.
2. All the persons shall maintain the 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 should be handled on "need to know" basis.
4. Files containing confidential information shall be kept in secured computer files & the files on 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 there own account, their relative accounts or Organization's firm's account or a client'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 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 panelized & 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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