

# SAROJ SECURITIES

309 KAN CHAMBER, 14/113 CIVIL LINES, KANPUR – 208 001

Member: The National Stock Exchange of India Ltd.

SEBI Regn No: INZ 000224427

## Policy on Insider trading

This policy aims to define & establish Saroj Securities (herein after referred to as the Trading firm), position & rules with respect to

1. **Prevention** of insider trading.

2. **Maintenance** of confidentiality of price sensitive information.

3. **Adherence** to securities and Exchange board of India (SEBI) applicable guidelines by all the connected or deemed connected persons including all the partners, employees for Prevention of Insider Trading.

- Saroj Securities has appointed a Compliance Officer.
- The Compliance Officer shall be responsible for setting Policies and Procedures and monitoring the Rules & Regulations for the preservation of "Price Sensitive Information", & monitoring of Trades and the Implementation of the Code of Conduct under the overall Supervision
- The Compliance Officer shall maintain a record of all Firm's Employees and any Changes done in the Employees List from time to time & help to understand any Clarifications regarding SEBI (Prohibition of Insider Trading) Regulations, 1992.

### **Prevention of "Price Sensitive Information"**

- Employees / Partners shall maintain the Confidentiality of all Price Sensitive Information & must not pass such Information directly or indirectly by way of making a Recommendation for the Purchase or Sale of Securities.
- Price Sensitive Information is to be handled on a "Need to Know" basis, i.e. Price Sensitive Information should be disclosed only to those within Saroj Securities, who need the Information to discharge their Duty and whose Possession of such Information will not give rise to a Conflict of Interest or Appearance of Misuse of the Information.
- All Files of Saroj Securities, containing Confidential Information shall be kept Secure & all computer files must have Adequate Security of Login and Password, etc

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- To prevent the Misuse of Confidential Information, FIRM separates those Areas which routinely have access to Confidential Information, considered "Inside Areas" from those Areas which deal with Sale / Marketing / Investment Advise or other Departments providing Support Services, considered "Public Areas".
- The Employees in the Inside Area shall not communicate any Price Sensitive Information to anyone in Public Area.

## **Prevention of Misuse of Price Sensitive Information**

- Employees / Partners shall not use Price Sensitive Information to Buy or Sell Securities of any sort, whether for their Own Account, their Relative's Account, Firm's Account or a Client's Account. The Trading Restrictions shall apply for Trading in Securities.
- All Partners / Employees of the Firm, who intend to deal in the Securities of listed Companies where the Firm has some assignments shall pre-clear the Transactions as per the pre-dealing Procedure as described here below.
- An Application may be made in such form as specify by Firm in this regard, to the Compliance Officer indicating the Name and Estimated Number of Securities that the Employees / Partners intends to deal in with details of Demat DP with which he has a Security Account, the Securities in such Depository Mode and any other details as may be prescribed by Firm in his rule & regulations.
- An Undertaking shall be executed in favour of Firm by such Employees / Partners incorporating, the following Clauses, as may be applicable
- That the Employees /Partners does not received any "Price Sensitive Information" at the time of signing the Undertaking
- That in case the employees / director / partner receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance officer of the change in his position and that he/she would completely refrain from dealing in the securities of listed companies.

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- That he / she has not contravened the Code of Conduct for prevention of Insider Trading as specified by Firm.
- That he / she has made a Full and True Disclosure in the matter

## **Penalty for Contravention of the Code**

- Any Employee / Partner, who trades in Securities or communicates any Information or counsels any Person Trading in Securities, will be treated as Contravention of the Code & conduct, may be penalized and appropriate Action may be taken by the Firm.
- Employees / Partners of the Firm, who violate the Code, may also be subject to Disciplinary Action by the Company.
- The Action by the Firm shall not preclude SEBI from taking any Action in case of Violation of SEBI (Prohibition of Insider Trading) Regulations, 1992 Information to SEBI in case of Violation of SEBI (Prohibition of Insider Trading) Regulations.
- In case of any violation observed by the Firm/ its Compliance Officer that there has been a Violation of these Regulations, The Compliance Officer shall inform the SEBI.