



POLICY OF INSIDER TRADING

The Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, was amended on 22nd February 2002 (hereinafter referred to as "Regulations") in terms of which a Stock Broker is required, inter alia, to frame a Code of Conduct for Prevention of Insider Trading by Employees of a Stock Broker, including its Directors

In line with the said Regulations, the following Code of Conduct (hereinafter referred to as "the Code") has been adopted by Dhyan Stock Broking Pvt Ltd (hereinafter referred to as "SCSPL"), Member of the Stock Exchange.

Director

- SCSPL has appointed a Compliance Officer who reports to the Managing Directors.
- The Compliance Officer shall be responsible for setting Policies and Procedures and monitoring the Rules & Regulations for the preservation of "Price Sensitive Information", pre-clearing of all Designated Employees and their Dependents Trades (directly or through respective Department heads as decided by the SCSPL). Monitoring of Trades and the Implementation of the Code of Conduct under the overall Supervision of the Directors

Prevention of "Price Sensitive Information"

- Employees / Directors 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 SCSPL, 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 SCSPL, containing Confidential Information shall be kept Secure & all computer files must have Adequate Security of Login and Password, etc
- The Employees in Inside Area may be physically segregated from Employees in Public Area.
- The Employees in the Inside Area shall not communicate any Price Sensitive Information to anyone in Public Area.

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Prevention of Misuse of Price Sensitive Information

- Employees / Directors shall not use Price Sensitive Information to Buy or Sell Securities of any sort, whether for their Own Account, their Relative's Account, SCSPL's Account or a Client's Account. The Trading Restrictions shall apply for Trading in Securities.

Penalty for Contravention of the Code

- Any Employee / Director who trades in Securities or communicates any Information or counsels any Person Trading in Securities, will be treated as Contravention of the Code & conduct, maybe penalized and appropriate Action may be taken by SCSPL
- Employees / Directors of SCSPL, who violate the Code, may also be subject to Disciplinary Action by the Company.
- The Action by SCSPL shall not preclude SEBI from taking any Action in case of Violation of SEBI (Prohibition of Insider Trading) Regulations, 1992

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