A C Choksi

INSIDER TRADING POLICY

Brief about Insider Trading Policy

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 A. C. Choksi Share Brokers Private Limited (hereinafter referred to as “ACCSBPL”), Member of Bombay Stock Exchange, National Stock Exchange of India Limited and MCX Stock Exchange Limited

Director

- ACCSBPL has appointed a Compliance Officer who reports to the Board of 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 ACCSBPL). Monitoring of Trades and the Implementation of the Code of Conduct under the overall Supervision of the Directors
- The Compliance Officer shall maintain a record of all ACCSBPL 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 and ACCSBPL’s Code.

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 ACCSBPL, 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 ACCSBPL, containing Confidential Information shall be kept Secure & all computer files must have Adequate Security of Login and Password, etc
- To prevent the Misuse of Confidential Information, ACCSBPL separates those Areas which routinely have access to Confidential Information, considered "Inside Areas" from those Areas which deal with Sale / Marketing / Investment Advice or other Departments providing Support Services, considered "Public Areas".
- 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.

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, ACCSBPL’s Account or a Client's Account. The Trading Restrictions shall apply for Trading in Securities.

- All Directors / Employees of ACCSBPL, who intend to deal in the Securities of listed Companies where ACCSBPL 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 ACCSBPL in this regard, to the Compliance Officer indicating the Name and Estimated Number of Securities that the Employees / Director 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 ACCSBPL in his rule & regulations.
- An Undertaking shall be executed in favor of ACCSBPL by such Employees / Directors incorporating, the following Clauses, as may be applicable –

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

Restricted / Grey List

- In order to monitor above Procedures and Trading in Client Securities based on Inside Information, ACCSBPL shall restrict Trading in certain Securities and designate such List as Restricted / Grey List.
- Security of a Listed Company shall be put on the Restricted / Grey List if ACCSBPL is handling any Assignment for the Listed Company or preparing Appraisal Report.
- Any Security, which is being purchased or sold or is being considered for Purchase or Sale by ACCSBPL on behalf of its Clients shall be put on the Restricted / Grey List
- As the Restricted List itself is a Highly Confidential Information it shall not be communicated to anyone outside ACCSBPL. The Restricted List shall be maintained & kept by Compliance Officer

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, may be penalized and appropriate Action may be taken by ACCSBPL
- Employees / Directors of ACCSBPL, who violate the Code, may also be subject to Disciplinary Action by the Company.
- The Action by ACCSBPL 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 ACCSBPL / its Compliance Officer that there has been a Violation of these Regulations, ACCSBPL shall inform the SEBI