

INVESTMENT POLICY FOR EMPLOYEES AND MANAGEMENT

PREAMBLE:

1. Code of Investment ("the **Code**") shall be called Investment Policy for Employees and Management of Pune E - Stock Broking Limited (Hereinafter referred to as "the **Company**")
2. The Code has been framed in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015 which stipulates that all employees and management of merchant banking company shall maintain confidentiality of Unpublished Price Sensitive Information and shall not share the said information with anyone and not use such information directly for the purpose
3. The term "**Management**" shall mean personnel of the Company who are Key Managerial Personnel, Compliance Officer and all directors of the Company. Normally, this would comprise of all members of management one level below the executive directors, including all functional heads.
4. The code of conduct shall be posted on the website of the Company.
5. The conduct of directors should be in accordance with the articles of association of the Company; but in no case should contravene the duties specified by the law.

APPLICABILITY:

The code shall be applicable to Employees of the Company and Management of the Company.

OBJECTIVE:

With a view to maintain high standards of governance, to induce and recognize the virtues of compliance and accountability and to avoid insider trading in all spheres of activities of the organization, the following rules/code is required to be observed. The Company appoint the Compliance Officer as principal officer responsible to maintaining compliance of this code and the Compliance Officer is responsible to take disciplinary action in case of breach of the code.

TERMS OF POLICY:

The Employees and Management Personnel are not permitted to buy, sell, hold or trade in the shares and securities of any clients associated with the Company directly or indirectly for perpetuity during their association with their Company or after employment.

The Employees and Management Personnel shall maintain confidentiality of Unpublished Price Sensitive Information and shall not share the said information with anyone and shall not use such information for personal gains in any manner.

DISCLOSURE REQUIREMENT:



The Employees and Management Personnel are required to submit a detailed list of investments held and traded by them on half yearly basis i.e. 30th September and 31st March in format as per Schedule I of this Code within 30 days of completion of the half year period.

The Employees and Management Personnel are required to submit a declaration that they have maintained confidentiality of Unpublished Price Sensitive Information and they have not shared the said information with anyone and not use information for personal gains in any manner.

In case any Employee or Management Personnel violates the said policy directly or indirectly, the said Employee or Managerial Personnel shall inform the Compliance Officer immediately.

BREACH OF POLICY:

In case of breach, the Directors/Management Personnel/Employee shall be personally responsible for the legal ramification of the violation of law and the Company is entitled to take legal action against such person in manner as the board of directors deems fit.

AMENDMENT / MODIFICATION / WAIVER:

This code may be amended and modified by the Board of the Company from time to time to protect the interest of the Company and subject to the provisions of applicable laws, regulations or guidelines. As a general policy, the Board will not grant waiver of this code for any breach.

