



Insider Trading Control Mechanism.

The Company is not a listed one and therefore the Insider Trading provision are not directly attracted by the Company's staff members. However, in relation to client's trading, the following measures are being employed:

1. Special care is being taken w.r.t. trading transactions of clients, which fall under any of the following categories:
 - Listed Corporate entities
 - Directors/Promoters/ Senior Management Personnel of Listed Companies
 - Banks
 - Mutual Funds
 - Other Domestic Financial Institutions
 - Foreign Institutional Investors (FIIs)
 - HNIs
2. The trading transactions of all of the above clients are being handled by separate trading team, comprising of senior trading executives.
3. All trading executives have been clearly advised not to undertake trading transactions in either their own or on behalf of their family members / relatives / friends.
4. Suitable arrangements have been made to ensure that other staff members/clients do not have any access to trading activities of such clients.

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