

**INSIDER TRADING POLICY FOR TRADING IN SECURITIES of Hardik
Fintrade Pvt. Ltd.**

SEBI has enacted the Prohibition of Insider Trading Regulations, 2002 AND subsequent insider trading regulations 2009 which is applicable to all market intermediaries like us. Pursuant to the said regulations and amendments in the said regulations from time to time, it is necessary that we being a capital market intermediary, do comply and follow the prescribed procedures in order to prevent the misuse of price sensitive information which an employee/client/director/officer of the company may have access to.

For the purposes of implementation of the code for trading in securities by employee/clients, definitions along with explanations where thought necessary are given as under:

II. DEFINITIONS:

"Securities" include-

- a) Shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature in or of any incorporated company or other body corporate;
- b) Derivative;
- c) Units or any other instrument issued by any collective investment scheme to the investors in such schemes;
- d) Government securities;
- e) Such other instruments as may be declared by the Central Government to be securities; and
- f) Rights or interests in securities.

Explanation: Mutual fund units, derivative products like futures and options are also covered.

"Client Company" means a listed company which has given mandate or proposes to give any mandate in relation to preparation of any research report, credit rating report, appraisal report or valuation report.

"Compliance Officer" means a senior officer(s) of the Company who are appointed as Compliance Officer(s) for overseeing the compliance with Prohibition of Insider trading.

"Price Sensitive Information" means any information which relates directly or indirectly to a company and which if published is likely to materially affect the price of securities of such company and includes-

- periodical financial results of the Company
- intended declaration of interim/final dividend
- issue of securities or buy-back of securities
- any expansion plans or execution of new projects
- amalgamation, mergers or takeovers,
- disposal of the whole or substantially the whole of the undertaking,

any significant changes in policies, plans or operations of the Company

III. Basic procedures for personal investments:

Moral conduct: Every employee/client is expected to put the interest of the Company before his/her personal interest.

Prevention of misuse of Price Sensitive Information: Employee/clients should not use price sensitive information to buy or sell securities of any sort, whether for their own account or relatives.

Transactions: All Employee/clients should do all their transactions only through HARDIK FINTRADE PRIVATE LIMITED

No Speculation or short sales permitted: Employee should not speculate in shares/derivatives. All purchase transactions have to be delivery based. Selling securities for which delivery has not been taken is prohibited.

Front Running transactions are strictly prohibited. Front running means transacting in a security knowing fully well that HARDIK FINTRADE PRIVATE LIMITED also intends to transact in the same security if any.

No passing of price sensitive information: Designated Employee/clients/Directors/ Dependent Persons are prohibited from passing on information to anybody inducing him/her to buy/sell securities.

Special Restrictions of Employee/clients in research department: Designated Employee/clients/Directors working as Research Analysts for preparing research reports of a client company shall disclose their shareholding/interest in such company to the compliance officer and shall not trade in securities of such client company for a period of at least 30 days from publication /preparation of such report. For this purpose, any employee/client in the research department should inform the company's name of which is

preparing a report and give an undertaking in the format prescribed in Annexure

In case any employee/client leaves us, he/she shall be required to give an undertaking that he/she will not deal with any transaction on the basis of unpublished price sensitive information.

Penalty for contravention of code of conduct

Any Directors/Designated employee/clients/dependent persons who trades in securities or communicates any information or counsels any person trading in securities, in contravention of this code of conduct may be penalised and appropriate action may be taken against him which may include disciplinary action by the company, which may include wage freeze, suspension, etc.