

Front Running & Insider Trading Policy

1] All dealers in the dealing room shall not divulge or disclose any information of any trades executed/ or being executed to anyone. Top most secrecy shall be observed.

2] All dealers in the dealing room shall not be allowed to use cellular phones during market hours or during post-closing hours.

3] The Retail & the HNI desk shall not be allowed to do a trade in the shares until the FI's/FII's/DFIS have completely executed their transaction during the day in the dealing room.

4] All conditions mentioned in the 'Dealing Room Policy 'shall be observed.

5] If dealers want to purchase or sell any share/ debt instrument they shall have to take prior approval from the Compliance Officer/Designated Director and shall be able to purchase shares only within 48 hours after which new approvals shall have to be taken.

6] All dealers in the dealing room desk shall not be allowed to have trading accounts other than at SCSPL.

7] Near relative of dealers shall also have to take prior approval to do a transaction in the equity/debt markets as per clauses (5).

8] All dealers in the dealing room shall have to submit their annual return copy along with the Stock transaction statement (CAS) & Bank Statement for inspection to the Compliance Officer / Principal Officer.

9] Incase the above Policy rules are not followed by the respective members of staff/professional's; the matter shall be referred to the Board of Directors / Compliance Committee & due actions shall be initiated.

Thanks and Regards,

Saurashtra Capital Services Pvt. Ltd.

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