

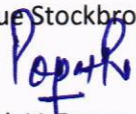
**Code of Internal Procedures and Conduct for prevention of  
Insider Trading**

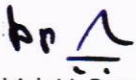
**UNIQUE**  
STOCKBRO PVT. LTD.

Policy created by	Operational staff
Policy reviewed by	Compliance Head
Approval authority	Board of Directors
Periodicity of Review periodicity	As and when any changes are introduced by any statutory authority or as and when it is found necessary to change the policy due to some eventuality
Officer responsible for implementation	Compliance Officer
Policy reviewed on	April 6, 2020
Policy approved by Board on	April 7, 2020

The Policy shall be implemented with immediate effect.

For & Behalf of  
Unique Stockbro Private Limited

  
Paresh V. Popat  
Director

  
Ashish V. Popat  
Director



Date: April 6, 2020

**Implementation of Policy for Code of Internal Procedures and Conduct for prevention of Insider Trading in accordance with SEBI (Prohibition of Insider Trading) Regulations, 1992 with effect from 1<sup>st</sup> May 2008.**

We have framed Code of Internal Procedures and Conduct for prevention of Insider Trading code of conduct required as per SEBI (Prohibition of Insider Trading) Regulations, 1992. The same is enclosed herewith. The said code of conduct will be effective from May 1, 2002. You are hereby required to comply with the followings. Basically there are five criteria for the Implementation of Policy for Code of Internal Procedures and Conduct for prevention of Insider Trading in accordance with SEBI (Prohibition of Insider Trading) Regulations, 1992.

**1. Initial Disclosures:**

Under the policy major thrust have been placed for Initial Disclosures. It is believed that initial disclosures will bring much needed transparency and fairness in all the dealings. Form A & Form B are part of the declaration procedure and all the Employees are required to submit their Initial Disclosures Form A & From B.

**2. Continual Disclosures:**

Continual Disclosure has the same relevance as Initial Disclosures. Each and every employee doing any transaction has to disclose all the relevant details on semi-annual basis. Form C & Form D are part of the Continual Disclosure procedure and all the Employees are required to submit their continual disclosures in Form C & From D.

**3. Pre clearance:**

Application for Pre clearance will have to be submitted if subscription/purchase value exceeds ₹ 2,00,000/-. Under this criteria Pre Clearance has to be taken by each and every employee before purchasing or selling any shares or securities. In the said application employee has to state name of the scrip & approximate value of the same. Under this employee also has to undertake that he does not possess any "Price

Sensitive Information”. In case he receives any “Price Sensitive Information” after signing of this letter but before execution of the transaction in that case he will refrain from dealing in the securities till the time such information becomes public and he has not contravened the code of conduct for prevention of insider trading.

**4. Confirmation of Deal:**

Confirmation of Deal needs to be submitted after execution of the trade stating all the relevant details of the trades.

**5. Minimum Holding Period:**

Every employee has to hold the shares for the minimum period of 30 days and before that shares can not be sold. In case any of the employees desires to sell the scrip within 30 days of the purchase/subscription he is required to apply for Waiver of minimum holding period.

**Declaration from Employee**

Date:

Employee Name:

Department:

Address:

To  
The Compliance Officer  
Unique Stockbro Pvt. Ltd.  
61/8, 'Chandanbala', Road No. 25-C,  
Sion (West), Mumbai – 400 022

THROUGH DIVISION / DEPARTMENT HEAD

Dear Sir,

I have read and understood the Code of Conduct defined by the company for Employees for dealing in Capital Market and agree to abide by the same. I hereby undertake that I will invest in Capital markets only through Unique Stockbro Pvt. Ltd.

I shall obtain if required, a clearance from my HOD and Compliance Officer according to the rules and regulations defined by the company, before placing any order for execution.

I personally will not place orders on the behalf of my family members/relatives with any broker other than Unique Stockbro Pvt. Ltd.

I shall abide by the rules and regulations as prescribed by SEBI, BSE and the company from time to time.

Sincerely,

Designation:

Department:

**APPLICATION FOR PRE-CLEARANCE**

(Applicable if subscription/ purchase value exceeding Rs. 2,00,000/-)

To

The HOD/ Compliance Officer

From:

Name

Designation

Department

THROUGH DIVISION / DEPARTMENT HEAD

With reference to the Copy of Code of Conduct for Employees for dealing in Capital Markets, I seek your approval to subscribe to / purchase / sell \_\_\_\_\_ (numbers) equity shares of the company \_\_\_\_\_ amounting to approximately a value of \_\_\_\_\_ Rs. \_\_\_\_\_ (Rupees \_\_\_\_\_). I am not in possession of any "Price Sensitive Information" with respect to the said scrip. I undertake to inform you in case of any "Price Sensitive Information" received by me after signing of this letter but before execution of the transaction. I will also refrain from dealing in the securities till the time such information becomes public. I have not contravened the code of conduct for prevention of insider trading. I also state that I have made full and true disclosure in the matter.

Date:

Signature:

**Pre-Clearance Order**

This is to inform you that your request for buy / sell ..... (Quantity) shares of ..... Limited amounting to approximately a value of Rs. ....as mentioned in your above-mentioned application is approved / not approved.

Please note that said transaction has to be routed through Unique Stockbro Private Limited. Further said transaction must be completed on or before \_\_\_\_\_ (date) that is within 7 days from today.

**For Unique Stockbro Pvt. Ltd.**

**Compliance Officer / HOD**

Date:

**Confirmation of Deal**

To  
The Compliance Officer  
Unique Stockbro Pvt. Ltd.  
61/8, 'Chandanbala',  
Road No. 25-C,  
Sion (West),  
Mumbai - 400 022

I confirm that the share dealing for which approval was granted on \_\_\_\_\_ was completed on \_\_\_\_\_ by purchasing / selling \_\_\_\_\_ (nos.) equity shares of the company \_\_\_\_\_ having value Rs. \_\_\_\_\_.

Date:

Signature:

**Application for Waiver of Minimum Holding Period**

To  
The Compliance Officer  
Unique Stockbro Pvt. Ltd.  
61/8, 'Chandanbala',  
Road No. 25-C,  
Sion (West),  
Mumbai - 400 022

Through Division / Department Head

Date: \_\_\_\_\_

Dear Sir,

I request you to grant me waiver of the minimum holding period of 30 days as required under  
The code for prohibition of insider trading with respect to shares of the  
\_\_\_\_\_ Company held by me / (name of  
relative) singly / jointly acquired by me on \_\_\_\_\_(Date). I desire to deal in the  
said shares on account of \_\_\_\_\_  
(give reasons).

Thanking You,

Yours Faithfully,

(Name)

(Designation)

(Department)



**Undertaking for SEBI (Prohibition of Insider Trading) Regulations, 1992**

To  
The Compliance Officer  
Unique Stockbro Private Limited  
61/8, 'Chandanbala',  
Road No. 25-C,  
Sion (West),  
Mumbai - 400 022

**Through Division / Department Head**

Date: \_\_\_\_\_

Dear Sir,

Sub: Undertaking required for SEBI (Prohibition of Insider Trading) Regulations, 1992

In connection with the above, I hereby undertake the followings:

1. I have maintained the confidentiality of all Price Sensitive Information. I have not passed on such information directly or indirectly by way of making a recommendation for the purchase or sale of securities.
2. I have handled price sensitive information on a "need to know" basis.
3. I have kept confidential information at a secured place. Computer files have been protected by login and password.
4. I have adhered to "Chinese Wall" policy of the company.

Thanking You,

Yours Faithfully,

(Name)

(Designation)

(Department)

To  
All Employees  
Unique Stockbro Private Limited  
61/8, 'Chandanbala',  
Road No. 25-C,  
Sion (West),  
Mumbai - 400 022

Sub: Implementation of Code of conduct in accordance with SEBI (Prohibition of Insider Trading) Regulations, 1992 with effect from 1<sup>st</sup> May 2008.

Dear Sirs/Madam,

We have framed code of conduct required as per SEBI (Prohibition of Insider Trading) Regulations, 1992. The same is enclosed herewith. The said code of conduct will be effective from 1<sup>st</sup> May 2008. You are hereby required to comply with the followings.

1. Initial disclosures are to be submitted in Form A & B, Declaration from Employee
2. Continual Disclosure to be submitted in Form C & D
3. Continual Disclosure on yearly basis of Undertaking For SEBI (Prohibition Of Insider Trading) Regulations, 1992 to be submitted on semi-annual basis.
4. Application for Pre clearance will have to be submitted if subscription/purchase value exceeds ₹ 2,00,000/-
5. Confirmation of Deal needs to be submitted after execution of the trade.
6. In case if you desire to sell the scrip within 30 days of the purchase/subscription, please apply for Waiver of minimum holding period.

For Unique Stockbro Pvt. Ltd.

(Compliance Officer)

**End of Report**

***Disclaimer:** Code of Internal Procedures and Conduct for prevention of Insider Trading as depicted above is subject to change from time to time having regard to change in circumstances & regulatory guidelines. Policy & Procedures for Code of Internal Procedures and Conduct for prevention of Insider Trading shall be reviewed periodically in accordance with regulatory guidelines and management perception.*