

ASIAN MARKETS — SECURITIES —

INSIDER TRADING POLICY

April 03, 2023



**Introduction:**

The Securities and Exchange Board of India (SEBI) has revised notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as “Regulations”) dealing, inter alia, with buying and selling of securities of the Company by employees / directors. With a view to simplify the understanding and implementation of the Code, the Company has laid down the Code. The Code is set forth below.

Purpose of the Code of Conduct

The Securities and Exchange Board of India (SEBI) has prescribed the SEBI (Prohibition of Insider Trading) Regulations, 2015 to be followed by Listed Companies and Market Intermediaries in order to prevent such entities and persons connected to such entities from dealing in securities on the basis of undisclosed price sensitive information. The SEBI (Prohibition of Insider Trading) Regulations, 1992 have been repealed and new regulations have been brought into force w.e.f. 15th May 2015.

This Policy & Code of Conduct seeks to put in place appropriate systems to ensure segregation of work areas of personnel handling price sensitive information as well as adopt a “Chinese Wall” policy. It also ensures that persons connected to the AMSEC do not deal in securities on the basis of unpublished price sensitive information.

The SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as “the Regulations”) mandate all market intermediaries to formulate an internal Code of Conduct to regulate, monitor and report, trading by employees and other connected persons towards achieving compliance with the Regulations.

OBJECTIVES OF POLICY:

The objective of the policy is not to discourage employees from buying or selling shares, but to:

1. Ensure that the Designated Persons do not take advantage of unpublished price sensitive information which is received by them during the regular course of their duties.
2. Designated Persons do not indulge in ‘front running’.
3. Designated Persons do not indulge in ‘fraudulent’ or ‘manipulative’ transactions.
4. Encourage long-term investments by employees.
5. Ensure proper safeguards to various businesses of AMSEC.
6. Discourage employees from engaging in personal trading on a scale or of a kind that would distract them from their daily responsibility.

Applicability

This Code is applicable to all employees of the ASIAN MARKETS SECURITIES PVT. LTD. (AMSEC) and Connected Persons as defined in this Code.

1. All Employees of the AMSEC are required to read this policy and comply with its provisions. Failure to comply with any of these provisions, shall constitute grounds for action, as deemed fit by the Board of Directors, including reference to the relevant Government/ Regulatory authorities.
2. AMSEC may, from time to time, amend this Policy or stipulate additional conditions, depending upon the situation and change in the internal policies to get the same implemented. All employees are bound by such changes/additions in the Policy as and when it comes into force.



3. Even when employee ceases to be in employment, for whatever reason, he/she must maintain the secrecy of confidential information learned during their employment or affiliation.

Definitions

“Act” means the Securities and Exchange Board of India Act, 1992.

“Associate Company & Subsidiary Company” shall have the same meaning as assigned under the Companies Act, 2013.

“Compliance Officer” means the Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

“Connected Person” means,-

i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.

ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -

a) An immediate relative of connected persons specified in clause (i); or

b) A holding company or associate company or subsidiary company; or

c) An investment company, trustee company, asset management company or an employee or director thereof; or

d) A member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

e) A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest.

“Designated Employees” shall mean the Employees of the Company and its Subsidiaries and Associates falling within the following categories:

- All employees of the Compliance Function
- All employees of Corporate Governance
- All employees of Institutional Equities
- All employees of Research
- All employees brought over the Chinese Wall



- Any other employee as may be determined and informed by the Compliance Officer from time to time.

“Director” means a member of the Board of Directors of the Company.

“Designated Person(s)” shall mean the Designated Employees and the Connected Persons, not being an Independent Director of the Company, its Subsidiary Company and Associate Company.

“Employee” means every employee of the Company including the Directors in the employment of the Company.

“Immediate Relative” means the spouse of a person and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in Securities;

“Insider” means any person who is:-

- i) A connected person; or
- ii) In possession of or having access to Unpublished Price Sensitive Information.

“Insider Trading Regulations” means the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015 as amended from time to time.

“Key Managerial Person” means person as defined in Section 2(51) of the Companies Act, 2013

“Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

“Trading” means an act of subscribing, buying, selling or dealing or agreeing to subscribe, buy, sell, or deal including pledge etc.

“Unpublished Price Sensitive Information” or **“UPSI”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- i. Financial results;
- ii. Dividends;
- iii. (Change in capital structure;
- iv. issue of securities or buy-back of securities;
- v. any major expansion plans or execution of new projects;
- vi. Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- vii. disposal of the whole or substantial part of the undertaking;
- viii. any significant changes in policies, plans or operations of the company
- ix. disruption of operations due to natural calamities
- x. developments with respect to changes in pricing/realisation on goods and services arising out of changes in government policy;
- xi. Litigation/dispute with a material impact;
- xii. Changes in key managerial personnel; and
- xiii. Material events in accordance with the listing agreement.



“Specified Persons” means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives’ are collectively referred to as Specified Persons.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

Role of Compliance Officer

AMSEC has appointed compliance officer. The Compliance Officer under this Code shall be responsible for:

- Framing policies and procedures for Prohibition of Insider Trading.
- Monitoring adherence to the rules for the preservation of UPSI.
- Pre-clearing of trades of designated persons to whom this policy applies.
- Monitoring of trades and the implementation of the code of conduct under the overall supervision of Board of Directors.
- Maintaining the Restricted List of Securities.
- Maintaining a record of the designated employees and identified persons and any changes made therein.
- Addressing any clarifications regarding SEBI (Prohibition of Insider Trading) Regulations, 2015 and the organization’s code of conduct.
- Report to SEBI any violation of the Code.

Communication or procurement of Unpublished Price Sensitive Information (UPSI)

No Insider shall communicate, provide, or allow access to any UPSI, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any insider of UPSI, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

It is the responsibility of every Employee / Director to maintain the confidentiality of all UPSI. UPSI is to be handled on a ‘need to know’ basis.

Need to Know:

- i. “need to know” basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- ii. All non-public information directly received by any employee should immediately be reported to the head of the department.

Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.



Trading Restrictions

- No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI.
- No employee shall trade in Derivative Segment where underlying is in restricted list. This restriction shall also be applicable to all immediate relatives of employees. However, this policy is not applicable to trades in Currency Derivatives, Index Derivatives i.e. Nifty, Bank Index etc. Debt instruments, Commodities (including commodity derivatives) and Mutual Funds.
- Security of a listed company shall be put on the restricted list if Designated Employees is in possession of any price sensitive information.
- Restricted list shall cover securities in which any recommendation has been changed / revised or the report of which is being released by Research Team of AMSEC.
- The Restricted List shall be maintained by the Compliance Officer.
- As the restricted list is highly confidential information it shall not be communicated directly or indirectly to anyone besides authorised personnel of the concerned departments of the company.
- No approval for the trade shall be granted in the securities covered under Restricted list

Pre-clearance of trades and Holding Period

Pre-clearance requirements and holding period requirements will be as specified by the Compliance Officer from time to time. Granting of pre-clearance shall be at the discretion of the Compliance Officer and, he/she shall not be obliged to give any reason for refusing pre clearance. All persons to whom this Code applies shall be required to report all decisions for not executing/partially executing trades after obtaining pre-clearance along with the reasons for such decisions, on a quarterly basis, in the format provided in **Annexure [A]** hereto. No person shall either trade in a security or apply for pre-clearance of such trade if such person is in possession of UPSI relating to the security. In case sale of securities before the expiry of the minimum holding period is necessitated by personal emergency, the Compliance Officer may waive the requirement for the minimum holding period. A request for waiver shall be made to the Compliance Officer in the format provided in **Annexure [B]**.

Holding Period

The following shall be minimum period for entering into opposite transaction (contra trade):

Particulars	Holding (contra trade) Period	
	Designated persons	Other employees
Securities covered under PMS	Six months	One month
Other securities	One month	One month

- The holding period as prescribed above shall also be applicable to securities acquired in Initial Public offerings / Further Public offerings / Offer for Sale.
- Analysts while preparing research reports of a listed company shall not trade in securities of that company for thirty days before and five days after publication of research report.
- In case sale of securities before the expiry of the minimum holding period is necessitated by personal emergency, the Compliance Officer may waive the requirement of minimum holding period. The employee needs to place request for waiver of minimum holding period by logging into the software and mention the reason for waiver of holding period. On being satisfied with the adequacy of the reason, the Compliance Officer may waive the minimum holding period on case to case basis.
- In case of execution of a trade, inadvertently or otherwise by a Designated Person which is in



violation of the stipulated holding period, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

Procedure for pre clearance

- a.) An application can be made in the IRF to the Compliance Officer indicating the details of the intended transaction. A proforma of the IRF is attached as **Annexure [C]**. The trades can be executed only once pre- clearance is granted.
- b.) The pre clearance granted is valid only for a day. If the order is not executed on the day on which the clearance is given, the concerned person will have to seek pre clearance again. In case of decision taken not to trade after securing pre-clearance, the concerned person will have to inform reasons to the Compliance Officer for such decision, within three days of the last date of validity of such pre clearance.
- c.) In case the Compliance Officer wishes to execute any transactions in his own account or in the account of his immediate relatives, his trades shall be approved by Managing Director or CEO or other Director of the company.
- d.) Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information.
- e.) If the trade request contains the name of the Security which is in Grey or Restricted List, the Compliance Officer will decline permission to trade, as per applicability of the list.
- f.) The Compliance Officer shall have the full right to ask for any demat statement or any other document at any time, to verify that the procedures mentioned in this Code are being followed.

Chinese Wall Implementation

No Insider shall communicate UPSI to any other person except on a need-to-know basis for furtherance of the Insider's legitimate purposes by permitting such other person to cross the Chinese Wall.

- The Chinese Wall is meant to ensure that those personnel engaged in activities which have access to confidential and price sensitive information are segregated and others will be 'brought over the Wall' only on a 'need to know' basis.
- To control the flow of confidential and UPSI, AMSEC has created a Chinese Wall to separate persons engaged in distribution, trading or other non-advisory activities (the "Trading Side") from persons engaged in research or PMS or other advisory activities (the "Advisory Side"). The Chinese wall is also meant to prevent persons on the Trading Side from gaining access to confidential information acquired or developed by the Advisory Side.



Crossing the Wall:

- In exceptional cases, if a person from the other departments is required to “cross over the Wall” the concerned Departmental Head shall send an intimation to the Compliance Officer giving details of the person crossed over the Wall with the reason for crossing the person over the Wall and the time frame for which the person shall stay over the Wall. This information shall be given on a “need to know” basis.

Declarations and reporting requirements:

a) Undertaking

- At the time of joining AMSEC, an undertaking in the format provided in **Annexure [D]** shall be executed in favour of the company by all persons to whom this Code applies, incorporating, inter alia, that in case he/she has access to or receives “Unpublished Price Sensitive Information” after signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his/her position and that he would refrain from dealing in the securities of the client company till the time such information becomes public.
- That he/she will not contravene the Code of Conduct for prevention of insider trading as specified by the organisation from time to time.
- That he/she shall make a full and true disclosure in the matter.
- That he/she shall indemnify the company against any regulatory action initiated against the company for his/her contravention of the rules, regulations and guidelines issued by regulatory agencies.

A similar declaration cum undertaking shall be given by the Designated Employees, to the Compliance Department every year i.e. as on March 31 of every financial year. The declaration should be submitted within 60 calendar days after the said March 31, in the format provided in **Annexure [E]** hereto, along with the annual holding statement.

b) Declaration- Immediate Relatives

- A declaration should be given by all persons to whom this Code applies giving details of their Immediate Relatives and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of Persons in which such person has a stake of more than 10%.
- The said declaration shall be given by the person for the period ending March 31 every year. The format of the declaration is attached as **Annexure [F]**.
- Any change in the list of Immediate Relatives and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable has a stake of more than 10%, should be intimated to the Compliance Officer immediately. Details of such change shall also be given in the format specified in **Annexure [F]**

c) Statement of Holding – Self and Immediate Relatives

- At the time of joining, all Designated Employees shall furnish demat account statement/s for Self and Immediate Relatives and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable has a stake of more



than 10%, whether such account is held with Asian Market Securities Ltd or with any other DP.

- Additionally, the Designated Employees shall submit such demat account statement/s for Self and Immediate Relatives and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable has a stake of more than 10%, as at March 31 every year, with in 30 calendar days after the said March 31. In case the shares are held in physical form, the Designated Employee shall furnish such holdings in the format as given in Annexure[G]

Consequences of violation of the Code

- Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- Any violation of this Code of Conduct by any person to whom this Code applies can lead to sanctions or severe punitive action against the erring person, including wage freeze, suspension or termination of employment/ association.
- Any employee who trades in securities on the Restricted List / Grey List or does not seek prior permission to trade shall indemnify and hold harmless the Company for any consequences thereof. In addition to termination of employment, if effected, such employee will personally bear the consequences of default, whether monetary or not.
- Disciplinary action taken by AMSEC is irrespective of the action that may be taken by The Securities and Exchange Board of India (SEBI) in respect of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Reports to Board of Directors

The Compliance Officer shall provide reports to the Board of Directors annually providing details of the dealings in securities by the designated persons.

General

A copy of the Regulations is available from the office of the Compliance Officer. Compliance Officer for the purpose of this Code shall be the person as may be reported to SEBI as a Compliance Officer. Employees are advised to acquaint themselves with their obligations under the Regulations. The Compliance Officer may be contacted for any clarification / assistance that may be necessary.

The Management reserves the right to add, alter or edit any of the above terms with or without prior intimation and the same shall be binding from time to time.



Annexure A

FORMAT FOR REPORTING OF DECISIONS NOT TO TRADE AFTER SECURING PRE-CLEARANCE

Date:

The Compliance Officer,
Asian Market Securities Pvt Ltd.

Dear Sir/ Madam,

I request you to please take on the record the reasons for not executing/partially executing trades after obtaining pre-clearance along with the reasons for such decisions for the quarter ended March/June/September/December.

Given below are the necessary details required for your perusal.

Sr. No.	Date of Approval	Name of Security	Buy/Sell	Quantity not executed	Reason for not executing/partially executing trade

Thanking you,

Yours faithfully,

Name of the Employee: _____

Signature: _____

Name of the Company: _____

Department: _____



APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

Date:

The Compliance Officer,

Asian Market Securities Pvt Ltd.

Dear Sir/ Madam,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Code of Conduct for Trading in Securities with respect to (no. of shares) of (name of the Company) held by me / (name of the Immediate Relative and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association in which the person to whom this Code is applicable have a stake of more than 10%) or singly/jointly acquired by me / my Immediate Relative and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association in which the person to whom this Code is applicable have a stake of more than 10% on (Date).

I desire to deal in the said shares on account of (give reasons). Given below are the necessary details required for your perusal.

Name of the broker with who account held

Trading Account Code _____

Date of purchase of shares _____

Thanking you,

Yours faithfully,

Name of the Employee: _____

Signature: _____

Name of the Company: _____

Department: _____



Annexure C

**SPECIMEN OF
APPLICATION FOR PRE-DEALING / CLEARANCE APPROVAL**

Date:

To,
The Compliance Officer,
Asian Markets Securities Pvt. Ltd.,
Mumbai.

Dear Sir/Madam,

Application for Pre-dealing / clearance approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

S.no.	Particulars	Details
1	Name of the applicant	
2	Designation	
3	Number of securities held as on date	
4	Folio No./DP ID / Client ID No.)	
5	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/subscribed/sold	
8	Price at which the transaction is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through Stock exchange or off-market deal	
11	Folio No. / DPID/ Client ID No. Where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully

(Signature of Employee)



(To be submitted by new joinees at the time of joining)

Annexure D

Declaration cum Undertaking

To,
The Compliance Officer

Date:

Dear Sir,
Sub: Declaration with regard to Insider Trading.

With reference to the captioned subject, I hereby declare that:

1. I have received AMSEC's Code of Conduct for Trading in Securities and have read and understood the same and I undertake to abide by the same.
2. I have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and do confirm & declare that I shall not contravene the same in any manner whatsoever.
3. In case I have access to or receive any "Unpublished Price Sensitive Information" before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I shall completely refrain from dealing in the Securities of the Client Company till the time such information becomes public.
4. I have made a full and true disclosure regarding trading accounts and share- holdings in my name and in the name of my Immediate Relatives, or Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable have a stake of more than 10%.
5. I undertake to obtain prior clearance from the Compliance Officer for all the trades I may execute in my account, my Immediate Relatives' account and in account of Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable have a stake of more than 10%, as per the pre-clearance requirement under the Code of the Company. I undertake to submit duly signed Investment Request Form to the Compliance Officer for approval before placing any order(s) in the Securities Market, if required.
6. I undertake to adhere with the minimum holding period requirement of the Code.
7. I further undertake not to pass on any unpublished price sensitive information directly or indirectly to any persons or by way of making a recommendation for the purchase or sale of securities. I also undertake not to use unpublished price sensitive information to buy or sell securities of any sort, whether for my own account, my Immediate Relatives' account, Company's account or a client's account.
8. I indemnify AMSEC and will continue to keep AMSEC indemnified against any regulatory action initiated against any of the Companies in the Group on account of my contravention of the rules/regulations and guidelines issued by regulatory agencies.



-
9. I undertake that I, my Immediate Relatives and Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which I or the persons to whom this Code is applicable have a stake of more than 10%, shall trade only through Asian Market Securities Ltd.

Name of the Employee: _____

Date of Joining: _____

Name of the Company: _____

Department: _____

Signature of the employee: _____



(To be submitted by existing employees every year along with the holding statement)

Annexure E

Declaration cum Undertaking

To,
The Compliance Officer

Date:

Dear Sir,
Sub: Declaration with regard to Insider Trading.

With reference to the captioned subject, I hereby declare that:

1. I have read and understood AMSEC Code of Conduct and I undertake to abide by the same. I also declare that I have not contravened the same in any manner whatsoever.
2. I have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and do confirm & declare that I shall not contravene the same in any manner whatsoever.
3. In case I have access to or receive any “Unpublished Price Sensitive Information” before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I shall completely refrain from dealing in the Securities of the Client Company till the time such information becomes public.
4. I have made a full and true disclosure regarding trading accounts and share- holdings in my name and in the name of my Immediate Relatives, Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable have a stake of more than 10%.
5. I undertake to obtain prior clearance from the Compliance Officer for all the trades I may execute in my account, my Immediate Relatives’ account and in account of Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this Code is applicable have a stake of more than 10% as per the pre-clearance requirement under the Code of the Company. I undertake to submit duly signed Investment Request Form to the Compliance Officer for approval before placing any order(s) in the Securities Market, if required.
6. I undertake to adhere with the minimum holding period requirement of the Code.
7. I further undertake not to pass on any unpublished price sensitive information directly or indirectly to any persons or by way of making a recommendation for the purchase or sale of securities. I also undertake not to use unpublished price sensitive information to buy or sell securities of any sort, whether for my own account, my Immediate Relatives’ account, Company’s account or a client’s account.
8. I indemnify AMSEC and will continue to keep AMSEC indemnified against any regulatory action initiated against any of the Companies in the Group on account of my contravention of the



rules/regulations and guidelines issued by regulatory agencies.

- 9. I undertake that I, my Immediate Relatives, Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which I or the persons to whom this Code is applicable have a stake of more than 10%, shall trade only through Asian Market Securities Ltd.

Name of the Employee: _____

Date of Joining: _____

Name of the Company: _____

Department: _____

Signature of the employee: _____

Annexure F

DECLARATION – IMMEDIATE RELATIVES

To,
Date
The Compliance Department,
Asian Market Securities Pvt Ltd.

I, _____ having my trading account with _____ and Trading Code/Unique Code (U.C.C) no. _____ do hereby declare

(i) The following persons are my Immediate Relatives:#

Sr. No.	Name	Relationship	Name of the broker with whom account held	U.C.C./Trading Code
1.				
2.				
3.				
4.				
5.				

(ii) The persons to whom this Code is applicable hold more than a 10% stake in the following concern(s)/firm(s)/companies/HUF/trust/ association of persons

Sr. No.	Name of concern / firm/ company	Type of concern (e.g. sole proprietorship/ partnership/company)	U.C.C./Trading code
1.			
2.			
3.			
4.			
5.			

(iii) I also undertake that in case of any change in the abovementioned list I shall intimate the same in writing to the Compliance Department at the earliest.

Signature: _____

Name: _____

Company:

Department: _____

A declaration is required to be submitted (appended and marked hereto as Annexure F) in case the spouse is not declared as Immediate Relative

Annexure G

Details of shareholdings

Name of the Employee:

Department:

Date:

Name of the client:		Trading a/c number:	
Relation with employee:			
Name of the broker:			
Sr. no.	Date of purchase	Name of the Security	No. of shares purchased
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

Signature of the Employee: _____

Note: Please attach separate sheet for different client codes.
--