

GCM Securities Limited

Brief about Insider Trading Policy

The Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, was amended on 22nd February 2002 (hereinafter referred to as "Regulations") in terms of which a Stock Broker is required, inter alia, to frame a Code of Conduct for Prevention of Insider Trading by Employees of a Stock Broker, including its Directors.

In line with the said Regulations, the following Code of Conduct (hereinafter referred to as "the Code") has been adopted by M/s GCM Securities Ltd. (hereinafter referred to as "GCM"), Member of Bombay Stock Exchange & National Stock Exchange Ltd.

Director

- GCM has appointed a Compliance Officer who reports to the Board of Directors.
- The Compliance Officer shall be responsible for setting Policies and Procedures and monitoring the Rules & Regulations for the preservation of "Price Sensitive Information", pre-clearing of all Designated Employees and their Dependents Trades (directly or through respective Department heads as decided by the GCM). Monitoring of Trades and the Implementation of the Code of Conduct under the overall Supervision of the Directors
- The Compliance Officer shall maintain a record of all GCM Employees and any Changes done in the Employees List from time to time & help to understand any Clarifications regarding SEBI (Prohibition of Insider Trading) Regulations, 1992 and GCM's Code.

Prevention of "Price Sensitive Information"

- Employees / Directors shall maintain the Confidentiality of all Price Sensitive Information & must not pass such Information directly or indirectly by way of making a Recommendation for the Purchase or Sale of Securities
- Price Sensitive Information is to be handled on a "Need to Know" basis, i.e. Price Sensitive Information should be disclosed only to those within GCM, 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.
- All Files of GCM, containing Confidential Information shall be kept Secure & all computer files must have Adequate Security of Login and Password, etc
- To prevent the Misuse of Confidential Information, GCM separates those Areas which routinely have access to Confidential Information, considered "Inside Areas" from those Areas which deal with Sale / Marketing / Investment Advice or other Departments providing Support Services, considered "Public Areas".
- The Employees in Inside Area may be physically segregated from Employees in Public Area.
- The Employees in the Inside Area shall not communicate any Price Sensitive Information to anyone in Public Area.

Prevention of Misuse of Price Sensitive Information

- Employees / Directors shall not use Price Sensitive Information to Buy or Sell Securities of any sort, whether for their Own Account, their Relative's Account, GCM's Account or a Client's Account. The Trading Restrictions shall apply for Trading in Securities.
- All Directors / Employees of GCM, who intend to deal in the Securities of listed Companies where GCM has some assignments shall pre-clear the Transactions as per the pre-dealing Procedure as described here below.
- An Application may be made in such form as specify by GCM in this regard, to the Compliance Officer indicating the Name and Estimated Number of Securities that the Employees / Director intends to deal in with details of Demat DP with which he has a Security Account, the Securities in such Depository Mode and any other details as may be prescribed by GCM in his rule & regulations.
- An Undertaking shall be executed in favor of GCM by such Employees / Directors incorporating, the following Clauses, as may be applicable –
 - That the Employees / Director does not received any "Price Sensitive Information" at the time of signing the Undertaking
 - That in case the employees / director / partner receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance officer of the change in his position and that he/she would completely refrain from dealing in the securities of listed companies.
 - That he / she has not contravened the Code of Conduct for prevention of Insider Trading as specified by GCM.
 - That he / she has made a Full and True Disclosure in the matter

Restricted / Grey List

- In order to monitor above Procedures and Trading in Client Securities based on Inside Information, GCM shall restrict Trading in certain Securities and designate such List as Restricted / Grey List.
- Security of a Listed Company shall be put on the Restricted / Grey List if GCM is handling any Assignment for the Listed Company or preparing Appraisal Report.
- Any Security, which is being purchased or sold or is being considered for Purchase or Sale by GCM on behalf of its Clients shall be put on the Restricted / Grey List
- As the Restricted List itself is a Highly Confidential Information it shall not be communicated to anyone outside GCM. The Restricted List shall be maintained & kept by Compliance Officer

Penalty for Contravention of the Code

- Any Employee / Director who trades in Securities or communicates any Information or counsels any Person Trading in Securities, will be treated as Contravention of the Code & conduct, may be penalized and appropriate Action may be taken by GCM
- Employees / Directors of GCM, who violate the Code, may also be subject to Disciplinary Action by the Company.
- The Action by GCM shall not preclude SEBI from taking any Action in case of Violation of SEBI (Prohibition of Insider Trading) Regulations, 1992

Information to SEBI in case of Violation of SEBI (Prohibition of Insider Trading) Regulations

- In case of any violation observed by GCM / its Compliance Officer that there has been a Violation of these Regulations, GCM shall inform the SEBI

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