

“CODE OF CONDUCT OF PREVENTION OF INSIDER TRADING”

The Securities & Exchange Board of India (SEBI) had formulated the SEBI (Insider Trading) Regulations, 1992 under the powers conferred on it under the SEBI Act, 1992. These regulations came into force with effect from 19th November, 1992.

SEBI has subsequently amended the existing regulations. The amended regulations are now called SEBI (Prohibition of Insider Trading) (Second Amendment) Regulations, 2002 (hereinafter referred to as “the Regulations”)

The below mentioned policy on INSIDER TRADING has been approved by the Board of Directors in their meeting. All the employees are required to follow the same and take due care for its proper implementation.

1. No person shall directly or indirectly use or employ in connection with the issue or purchase or sale of any security listed or proposed to be listed in the recognized Stock Exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 or rules made there under.
2. All the persons shall maintain confidentiality of all price sensitive information & shall not pass such information directly or indirectly by way of making of any recommendation for the purchase or sale of that security.
3. Price sensitive information to be handled in the office on the “need to know” basis only. Any passing of the information to any another person should be with the written permission of the compliance officer.
4. Files containing confidential information shall be kept in secured places & the computer files / files in electronic media shall be adequately secured by login or a password.
5. No person shall discuss, talk or communicate any price sensitive information to anyone in “public area”.
6. Any person shall not use price sensitive information for buying or selling of securities of any sort, whether for their own account or their relative’s account or organization’s account.
7. If any of the client of the company is a listed entity, then, all client who intend to deal in this listed Company (which is client of DSPL) then the client shall take pre-clearance for such a transaction as described under the Regulation of SEBI.
8. Any persons who trades in securities or communicates any information or counsels any person in trading in securities in contravention of code of conduct may be penalized & action may be taken under the SEBI Regulations.
9. Front running transactions are strictly prohibited. Front running means transacting in a security knowing fully well that DSPL/ DSPL’s clients also intends to transact in the same security.
10. Research Department, Dealing Department of the Company shall be categorised as Inside Areas. All other Departments of the Company shall be categorised as Public Areas. The employees in the Inside Areas shall not communicate any Price Sensitive Information to any one in Public Areas.

The Employees in the inside area will remain physically segregated from the employees in public area.

In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

11. Employees in Research Department who are working on a research project of any listed company, shall disclose their shareholding/interest before commencing the research and submit a statement regarding his/her holding(s) in securities (including holdings of his/her dependents) in such a listed company and also an undertaking that he or his dependents shall not deal in the securities of the said company or body corporate for a period of 30 days from the date of completion of the research report.
12. In case of any observation regarding violation of code of conduct, the same shall be brought to the notice of Compliance officer.