

## **Code of Conduct for Prevention of Insider Trading for Listed Companies**

- 1.0 Compliance Officer
- 1.1 The listed company has appointed a compliance officer (senior level employee) who shall report to the Managing Director / Chief Executive Officer.
- 1.2 The compliance officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of “Price Sensitive Information”, pre-clearing; of designated employees’ and their dependents’ trades (directly or through respective department heads as decided by the company), monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of the listed company.
- Explanation: For the purpose of this schedule, the term ‘designated employee’ shall include: -
- (i) officers comprising the top three tiers of the company management.
  - (ii) the employees designated by the company to whom these trading restrictions shall be applicable, keeping in mind the objectives of this code of conduct.
- 1.3 The compliance officer shall maintain a record of the designated employees and any changes made in the list of designated employees.
- 1.4 The compliance officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 and the company's code of conduct.