

INSIDER TRADING POLICY

As per The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, We have formulated the internal code of conduct for Insider trading as under. It is binding on all the employees working at all our locations.

Insider means:

- Any person who is:
 - a connected person; or
 - in possession of or having access to unpublished price sensitive information;
- This is intended to bring within its reach any person who is in receipt of or has access to unpublished price sensitive information.

Connected Person means:

(i) a Director, officer or employee of the Company who directly or indirectly, has access to Unpublished Price Sensitive Information or is reasonably expected to allow such access;

(ii) a former employee of the Company, its officer or director (satisfying the requirements in sub-clause (i) above, while in employment) till the expiry of a period of 6 months from the date of termination or expiry of his employment or term of directorship;

(iii) 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 intermediary as specified in section 12 of the Act or an employee or director thereof; or

(d) an investment company, trustee company, asset management company or an employee or director thereof; or

(e) an official of a stock exchange or of clearing house or corporation; or

(f) 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

(g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

(h) an official or an employee of a self-regulatory organization recognized or authorized by the Board;

(i) a banker of the company; or

(j) 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.

(iv) any other person designated as a Connected Person by the Compliance Officer.

Unpublished Price Sensitive Information means: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) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;

(v) changes in key managerial personnel; and

(vi) material events in accordance with the listing agreement.

Preservation of Price Sensitive Information:

Directors and Employees shall maintain confidentiality of all price sensitive information.

Files containing confidential information shall be kept secure. Computer files containing confidential information shall have adequate security of password.

The Group Functional Heads and the Business Unit Heads shall ensure that price sensitive information is disclosed only to those within the Company who need the information to discharge their duty.

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, Wealthstreet Advisors Private Limited's Account or a Client's Account. The trading restrictions shall apply for trading in 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 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.
- An application may be made in such form as specify by Wealthstreet Advisors Private Limited in this regard to the Compliance Officer indicating the name and estimated number of securities that the Employees / Directors 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 Wealthstreet Advisors Private Limited in the rules & regulations. (Refer Annexure: A)
- An undertaking shall be executed in favour of Wealthstreet Advisors Private Limited by such Employees / Directors incorporating, the following Clauses, as may be applicable (Refer Annexure: B)
 - that the Employees / Directors does not received any "Price Sensitive Information" at the time of signing the undertaking.
 - that in case the Employees / Directors 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/her position and that he/she would completely refrain from dealing in the securities of the aforesaid company.
 - that he / she has not contravened the code of conduct for prevention of insider trading as specified by Wealthstreet Advisors Private Limited.

Compliance Officer:

We have duly appointed a compliance officer for prevention of insider trading and compliance of the norms laid down by SEBI and for observance of such thinlly transactions made.

Penalties for Contravention of the Code:

- Any Employees / Directors who trade in securities or communicates any information or counsels any person trading in securities, will be treated as contravention of the code of conduct, may be penalized and appropriate action may be taken by Wealthstreet Advisors Private Limited.
- Employees / Directors of Wealthstreet Advisors Private Limited, who violate the Code of conduct may also be subject to disciplinary action by the company which include wage freeze, suspension and termination of services.
- The action by Wealthstreet Advisors Private Limited shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015

Information to SEBI in case of Violation of SEBI (Prohibition of Insider Trading) Regulations,2015:

- In case it is observed that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall inform SEBI by the Compliance Officer or any person authorised by the Board of Directors.

The company at present observe above said procedure for prevention of insider trading. We shall update our internal code of conduct keeping in view timely circulars, guidelines and instructions laid down by the regulatory authorities and in consultation with inspection authorities.

For, Wealthstreet Advisors Private Limited

Ajay Saraogi

Director

Annexure: A

**APPLICATION TO THE COMPLIANCE OFFICER
WEALTHSTREET ADVISORS PRIVATE LIMITED
(NOTICE BY DESIGNATED EMPLOYEE / DIRECTOR REGARDING SHAREHOLDING)**

Name of the Employee / Director	
---------------------------------	--

Part: 1

Name of the Company whose securities to be dealt in	
No. of shares to be dealt in	
No. of shares presently owned by the applicant	
Details of Demat Account No. wherein the aforesaid shares are held by applicant [Else details of physical shares such as Folio No., Certificate No., Distinctive No. etc. to be provided]	

Part: 2

Details of Indirect Shareholding in Company whose securities to be dealt in {name of shareholder and relationship with applicant – such as spouse, child, partner, company, partnership}	
--	--

Part:3 : Change in Details of Director / Indirect Shareholding in Company whose securities to be dealt in by applicant

Name of Shareholder	
Relationship of shareholder with applicant	
Date of Change	
No. of shares held prior to change	
No. of shares purchased	
No. of shares sold	
Value / Consideration	
Nature of Change (e.g. on-market trade, off-market trade, exercise of options etc.)	
No. of shares held after change	
Details of Demat Account No. wherein the shares are held by applicant after such change [Else details of physical shares such as Folio No., Certificate No., Distinctive No. etc. to be provided]	

Signed: _____

Date: _____

Annexure: B

Rs. 50/-

Undertaking

**TO,
THE COMPLIANCE OFFICER,
WEALTHSTREET ADVISORS PRIVATE LIMITED (WSAPL)
AHMEDABAD**

With reference to my application/notice regarding change due to purchase / sell of shares of M/s _____ attached herewith, I, Mr. / Ms. _____, a Designated Employee / Director of the company do hereby declare and undertake as under:

- (1) I do not have any access or have not received any "Price Sensitive Information" of aforesaid company upto the time of signing this undertaking.
- (2) In case, I will have access to or receive "Price Sensitive Information" of aforesaid company after signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would completely refrain from dealing in the securities of the aforesaid company till the time such information becomes public.
- (3) I have not contravened the code of conduct for prevention of insider trading as specified by the WSAPL from time to time.
- (4) I have made a full and true disclosure in the matter.

Signed and submitted on this _____ day of _____, 20_____.

Signature: _____

Name: _____

Address: _____

[Note: to be executed on Rs. 50/- stamp paper]