

DEALING ROOM POLICIES

(Version 2022-2023)

Integrity and Fair Dealing in Dealing with clients:

All employees are expected to observe high standards of integrity and fair dealing at all times. Client should always be dealt with honestly and fairly.

Recommendations

You should take reasonable steps to give clients sufficient and comprehensible information concerning an investment to enable them to make a balanced and informed investment decision. Research recommendations should be based on thorough analysis, and should take into account available alternatives. Research recommendations should only be made if there is a reasonable basis, which can be substantiated through publicly available information (e.g., company reports, published research, etc.). Research and other materials marked "For Internal Use Only" should not be distributed outside the Firm.

Personal Conflicts of Interest with Clients

Employees should at all times avoid any actual or apparent personal conflict of interest with the Firm's clients. The employees must not enter into a personal business or financial arrangement. In particular, the employees must not directly or indirectly:

- (i) Act personally as a custodian for a client's securities, money or other property;
- (ii) Deposit funds, endorse or cash a client's cheque in a personal account;
- (iii) Borrow from or lend to clients any money or securities;
- (iv) Maintain a joint account with any client;
- (v) Give a guarantee to a client orally or in writing against loss or level of performance in an account;
- (vi) Participate in the profits or losses of any client's accounts or in any other benefit resulting from a transaction;
- (vii) Rebate or share any part of your compensation as a quant direct employee or pay such compensation, directly or indirectly, as a bonus, commission, fee or other consideration for business sought or procured; and
- (viii) Act in an individual capacity outside the scope of your quant.

Internal Policy on Usage of Mobile Phones by Employees during trading hours

- Use of mobile phones is not allowed during market hours and after market hours landline phone is encouraged to be used as per best industry practices, as all conversations are recorded.
- Recorded lines would be listened by authorised person(s) on a random basis.
- Mobile phones should be kept in switched off/ silent mode with the department assistant during trading hours. Exceptions any, if due to personal exigencies should be approved by the compliance officer.
- Restricted Access to Dealing Rooms would be allowed during trading session.
- No use of mobile phones for taking orders or confirmation of deals.
- Mobile phones must be deposited at the reception if entering the dealing room(s) and should **not be used** thereafter till 4.00pm on that day.
- Any violation from the above policies would attract penalty in terms of initiating disciplinary action against the employee and/or termination of services.