

**Code of Conduct for Prevention of Insider Trading**  
(Version 2023-24)

**Applicability**

1. These Guidelines shall be applicable to **all employees** of quant Group. New employees shall be bound by these Guidelines from the date of joining the quant Group.
2. These Guidelines shall cover **transactions for sale or purchase of any securities whether listed or unlisted** made:
  - a. In the name of **employees, either individually or jointly,**
  - b. In the name of the **employees' spouse,**
  - c. As a member of **HUF,**
  - d. In the name of **employees' dependent parents, sibling and child** of such employee or of the spouse, any of whom is either dependent financially on such employee or consults such employee in taking decision relating to trading in securities.

**Chinese wall**

1. To prevent the misuse of confidential information the organization has adopted a 'Chinese Wall' policy which separates those departments of the Company which routinely have access to confidential information, considered "Sensitive Departments" from 'Public Departments'

**Sensitive Departments**

Investment Banking Department

**Public Departments**

Dealing Department  
Research Department  
Risk Department  
Settlement Department  
IT Department  
Marketing and Business Development Department  
Wealth Management Department  
Administration Department  
Human Resources Department  
Accounts & Finance Department  
Secretarial, Legal and Compliance Department

2. The Employees in the 'Sensitive Department' shall not communicate any Price sensitive information to anyone in public department.
3. The Employees in sensitive departments are physically segregated from employees in public departments.
4. Demarcations of the various departments as sensitive departments are implemented by

the Company.

5. Access of employees to the Offices/Departments of the various group companies are defined according to their functions and are governed & monitored accordingly. Restricted access is allowed to employees by swiping access control cards.

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

### **(C) General provisions applicable to employees of all categories (Sensitive Departments and Public Departments)**

#### **1. Initial and subsequent disclosures:**

An initial disclosure of the Dependents, as per **ANNEXURE “B”** is to be submitted by all the new employees on the date of joining. Subsequently holdings as on 31st March and as on 30th September will have to be submitted by all the employees, as per **ANNEXURE “D”** before the tenth of the following month i.e. before 10th April and 10th October respectively every year.

#### **2. Holding Period:**

Holding period should be for a Minimum period of 30 days (inclusive of Sundays and other holidays) for any trade including for F&O.

The holding period shall also apply to purchases in the primary market (IPO). In the case of IPOs, the holding period would commence when the securities are actually allotted.

In case the sale of securities is necessitated due to personal emergency, the Compliance Department may waive the holding period after recording in writing reasons in this regard. (The application for waiver of minimum holding period annexed as ANNEXURE “A”)

#### **3. Preservation of misuse of "Price Sensitive Information":**

Employees shall maintain the confidentiality of all Price Sensitive Information. Price sensitive information in our business will be bulk trades of clients/institution executed in our office, any information acquired during the course of conducting research which may not be available to general public and any information acquired during the course of business which otherwise would not have been available to general public.

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.

Employees shall not use price sensitive information to buy or sell securities of any sort, whether for their own account, their relative’s account.

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

The employees in Research department shall not trade in securities of the Company before 24 hours of the release of the research reports of any listed or unlisted Company.

#### **4. Restricted / Grey List**

The Company may at its own discretion restrict dealing in certain securities and designate such list as restricted/grey list.

As the restricted list itself is highly confidential information, it shall not be communicated directly or indirectly to anyone. Compliance Department shall maintain the Restricted/Grey List.

When any securities are on the restricted/grey list, trading in these securities may be blocked or may be disallowed at the time of pre-clearance.

#### **6. Front Running transactions are strictly prohibited**

Front running means transacting in a security knowing fully well that Quant or client(s) of Quant also intends to transact in the same security / commodities and includes purchase of securities/ futures/options during the period 15 days prior to the initiation of research in that scrip/commodity has been initiated and till the time the research report has been published/ released.

#### **(D) Additional Provisions applicable to the Employees in Sensitive Departments**

1. Designated employees and employees in sensitive departments who intend to deal in the securities shall pre-clear the transactions from Compliance Department as per the enclosed format in **ANNEXURE "C"**.
2. The Compliance Department may approve or reject the application made by the employees.
3. The approval given by the Compliance officer shall be valid for that day only, after which, a fresh approval will have to be obtained. The approval has to be prior to execution of transactions.

#### **(E) Penalty for contravention of Code of Conduct**

Employees who violate the code of conduct will be subjected to appropriate action by the Company, which may include disciplinary action, wage freeze, suspension, termination of services etc.

**ANNEXURE "A"**  
**APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD**

Date: \_\_\_\_\_

The Compliance Officer,

Dear Sir,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Code of Conduct for Prevention of Insider Trading with respect to \_\_\_\_\_ Shares of the scrip \_\_\_\_\_ held by me / dependent \_\_\_\_\_ (Name of dependent) singly / jointly acquired by me//dependent on \_\_\_\_\_ (Date).

I/dependent desire to deal in the said shares on account of \_\_\_\_\_ (give reasons).

Thanking you,

Yours faithfully,

**Name:** \_\_\_\_\_

**Designation & Department:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

Remarks of the Compliance Officer: \_\_\_\_\_

\_\_\_\_\_  
Signature of the Compliance Officer

Date: \_\_\_\_\_



**Annexure B**  
**QUANT GROUP – Declaration of Dependents**

Date:

Emp. Code: \_\_\_\_\_

Name of the Employee: \_\_\_\_\_

Name of the Company: \_\_\_\_\_ Department: \_\_\_\_\_

Sr. No.	Name of the Dependent	Relationship with the Employee

\_\_\_\_\_  
Signature of Employee

Date: \_\_\_\_\_

Emp. Code: \_\_\_\_\_

Trading A/c. Code : \_\_\_\_\_

Name of the Person: \_\_\_\_\_

Trading A/c. Name: \_\_\_\_\_

Name of the Company: \_\_\_\_\_

Department: \_\_\_\_\_

<b>Emp. Code:</b>			<b>Trading Code</b>	<b>A/c.</b>		
<b>Name of Employee:</b>			<b>Name of Account Holder</b>			
<b>Name of the Company:</b>			<b>Department:</b>			
<b>Sr.</b>	<b>Date of Purchase</b>	<b>Name of Security</b>	<b>Buy/ Sell</b>	<b>Exchange</b>	<b>Quantity</b>	<b>Price Limit (excluding brokerage)</b>
		TOTAL				

Note: Orders are valid for **the** day only

Nature of Trade: **Equity**

**DECLARATION**

I hereby declare and undertake that;

- a) I have read and understood the Code of Conduct for Prevention of Insider Trading set by the Company with regard to investments by all persons to whom this code is applicable and the above transaction(s) is/are not in contravention of the same.
- b) The intended transaction is on my account or relative
- c) The said transaction is not on account of any other third party.
- d) The securities purchased shall be credited to such DP IDs as registered with the company. The securities sold shall be transferred from such DP IDs as registered with the company.
- e) All sale transactions on cash segment are for shares held by me for at least 30 days.
- f) All purchases of shares will be held by me for a minimum period of 30 days.

\_\_\_\_\_

\_\_\_\_\_

Signature of Employee

Signature of Approver

Approved By: \_\_\_\_\_

Date of Approval: \_\_\_\_\_

**Annexure D**

**(Refer Point No. 8 of the Code of Conduct for Prevention of Insider Trading for dealing in equity shares)**

Date: \_\_/\_\_/\_\_(dd/mon/yyyy)

Emp.Code: \_\_\_\_\_

Name of the Employees: \_\_\_\_\_

Name of the Company: \_\_\_\_\_

Department: \_\_\_\_\_

Transactions for period: \_\_\_\_\_

Name & Address of Person/Dependent	Relationship with the person (in case of dependents)	Name of the security	Date of Transaction/ Allotment	Mode of Acquisition (market purchase/ IPO/ rights/ pref. offer, etc.)	Trading member through whom the trade was executed with SEBI Regn. No. of the TM	Exchange on which the trade was executed	Buy Quantity

@give list of transactions where applicable including names and relationship. **You may please use the above format to provide details in additional sheets with signatures on each of them, if required.**

Signature of Employee \_\_\_\_\_