

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF  
TRADING IN SECURITIES:**

**INTRODUCTION**

The SEBI (Prohibition Insider Trading) Regulations, 2015 (hereinafter referred to as “**the Regulations**”) mandate all market intermediaries to formulate an internal Code of Conduct to regulate, monitor and report trading by employees and other connected persons towards achieving compliance with the Regulations.

**Dhanam Capital Advisors Private Limited (DCAPL)** is engaged in the business of merchant banking, underwriting, corporate and financial advisory.

This Code of Conduct has been prepared to specify the responsibilities of the employees of DCAPL, with regard to their business and professional conduct – internal as well as external. This Code is applicable to all employees engaged in any business conducted by DCAPL. Each employee of DCAPL is required to carefully read and understand this policy and also strictly comply with its provisions. Failure to comply with any of these provisions, shall constitute grounds for action, as deemed fit by the Board of Directors of DCAPL, including reference to the Regulatory / Competent Authorities.

This Code is a confidential document of DCAPL and is meant for internal use by the employees of DCAPL. This document should not be distributed for any purpose outside DCAPL, without the written prior permission of the Compliance Officer.

This Code may not cover all the situations the employee may face. In case of difficulty in understanding or interpretation of any section of this Code, please seek the guidance of Compliance Officer.

DCAPL has absolute right and authority to amend this Code or stipulate additional Codes, from time to time, depending upon the situation and change in the internal policies of DCAPL. All employees of DCAPL are bound by such changes / additions / amendments in the Code as and when it comes into force.

**APPLICABILITY**

This code is applicable to all employees of DCAPL and connected persons as defined in this code.



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For DHANAM CAPITAL ADVISORS PVT. LTD.



**DIRECTOR**



## DEFINITIONS

**“Act”** means the Securities and Exchange Board of India Act, 1992.

**“Board”** means the Board of Directors of the Company.

**“Company”** or **“the Company”** or **“DCAPL”** means Dhanam Capital Advisors Private Limited.

**“Compliance Officer”** means Compliance Officer in terms of the Regulations.

**“Connected Person”** means:

- (i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
- (ii) 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 recognised or authorized by the Board; or
  - (i) a banker of the company; or



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(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;

**“Dealing in Securities”** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in any securities.

**“Employee”** means Directors and every employee of the Company including their connected persons.

**“Immediate Relative”** means a spouse of a person and includes parent, sibling and child of such person or of the spouse, any of whom is either dependent financially on such person or consults such person in taking decisions relating to trading in securities.

**“Insider”** means any person who is:

- a) A connected person; or
- b) In possession of or having access to unpublished price sensitive information.

**“Regulations”** shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation 2015 and any amendments thereto.

**“Securities”** shall have the meaning assigned to it under the Securities Contracts Regulation Act, 1956 or any modification thereof except units of a Mutual Fund.

**“Trading”** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities including pledge etc.

**“Unpublished Price Sensitive Information” or “UPSI”** 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.



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### Appointment of Compliance Officer

Ms. Puja Kumari will be responsible for compliance of various regulatory provisions governing the activities of DCAPL. Any queries, suggestions to this policy may be addressed to him at [compliance@ghanamcapital.in](mailto:compliance@ghanamcapital.in).

### Functions of the Compliance Officer

The Compliance Officer under this code shall be responsible for:

- i. Setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information;
- ii. Pre-clearance and monitoring of trading by employees;
- iii. Implementation of this Code under the over-all supervision of the Board of Directors of the Company;
- iv. Maintaining the Restricted List / Grey List of Securities;
- v. Maintaining a record of the Employees, their immediate relatives and any changes made therein;
- vi. Addressing any clarifications regarding SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct;
- vii. Report to SEBI any violation of the Code / Regulations.

The Compliance officer shall report on insider trading to the Chairman / Board of Directors of the Company and shall provide reports to the Board at such frequency as may be stipulated by the Board of Directors.

The compliance officer shall maintain a "Restricted List / Grey List" of securities which shall be used as the basis for approving or rejecting applications for preclearance of trades.

### HANDLING OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

All information is required to be handled on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the Insiders' legitimate purposes, performance of duties or discharge of his legal obligations.

No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate



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For DHANAM CAPITAL ADVISORS PVT. LTD.

A handwritten signature in blue ink, followed by the word 'DIRECTOR' in bold blue capital letters.



purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

#### **LIMITED ACCESS TO CONFIDENTIAL INFORMATION**

All employees shall ensure that persons not normally privy to the confidential information do not have access to such information. All employees are required to maintain adequate security for their computer files by using appropriate login and password. Access to network folders shall be restricted only to the persons dealing in that particular function.

#### **EMPLOYEE INVESTMENT AND TRADING POLICY**

The Employee Investment and Trading Policy has been designed in order to prevent illegal and unethical business conflicts and to guard against the misuse of proprietary or confidential information provided to DCAPL by the clients – existing and prospective. The objective of the policy is not to discourage investment and trading by employees, but to:

- Encourage long-term investments by employees;
- Ensure proper safeguards to businesses of DCAPL;
- Discourage employees from engaging in personal investment and trading on a scale or of a kind that would distract them from their daily responsibilities;
- Not to engage in investment and trading that might result in the appearance of impropriety;
- Discourage speculative / manipulative trading;
- Discourage investment / trading based on prior price sensitive information; and
- Ensure priority on client's interest and transactions.

#### **PRE-CLEARANCE OF EMPLOYEE TRADE**

##### **Secondary Market Trading**

All trading / investments (in secondary market and secondary public offerings of the capital and commodities market including private transactions) by the employees of DCAPL will be cleared by the Compliance Officer.

Seeking pre-clearance implies that the employee has declared that he / she is not in possession of



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any unpublished price sensitive information and their investments trading are in compliance with this Policy.

To obtain the authorisation the employee shall apply to the Compliance Officer for consideration. In case of transactions to be executed by the Compliance Officer, the request will be forwarded to any of the Director/ CEO. The trades can be executed only once pre clearance is granted.

Pre clearance can be obtained by making an application to the Compliance Officer in the format provided in **Annexure - A**.

The Compliance Officer/CEO/Director, while approving employees request for pre-clearance, may consider, among other factors, the following:

- Appearance of the security on the Restricted list/grey list
- Possession of Inside Information;
- Appearance of Impropriety (trades that appear to be as creation of artificial market, manipulation etc. and could be queried by the regulatory authorities, excessive speculation, trades that are in conflict with the interest of the clients, etc.);
- Unusual trading activity;
- Incidence of front running; and
- Possibility of Insider Trading.

Granting of pre clearance shall be at the discretion of the Compliance Officer and he/she shall not be obliged to give any reason for refusing pre clearance.

On receiving the approval from the Compliance Officer, the employee can execute the transaction. Once the transaction is executed the concerned employee shall inform the Compliance Officer in the format provided in **Annexure -B**.

The pre-clearance will be valid for seven (7) working days after the intimation of the approval from the Compliance Officer. If the trade is not executed within seven (7) working days, then fresh approval has to be taken again from the Compliance Officer.

If the security, proposed to be traded by the employee, is placed on the Restricted List / Grey List, immediately after the approval (24 hrs.), then the pre-clearance shall be withdrawn and the trade (or un-executed part thereof) shall not be executed by the employee.

No person shall trade in a security or apply for pre clearance of such trade if such person is in possession of UPSI relating to the security.



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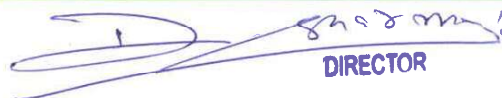


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If the employee does not wish to execute the trade, after obtaining pre-clearance, and the trade has not been executed, the employee should inform the Compliance Officer immediately in the format provided in **Annexure - C**.

In case sale of securities before the expiry of minimum holding period is necessitated by personal emergency, the Compliance Officer may waive the requirement for the minimum holding period. A request for waiver shall be made to the Compliance Officer in the format provided in **Annexure - D**.

The Compliance Officer shall have the full right to ask for any demat statement or any other document at any time, to verify that the procedures mentioned in this Code are being followed.

### **Investments in IPOs**

All employees (including their immediate relatives) of DCAPL are prohibited from making application in the IPOs of the issuer company for which DCAPL has procured the mandate for management of their public offerings, irrespective of their position. In case of secondary offering, where DCAPL is the merchant banker, the employees of DCAPL are prohibited from applying in such secondary IPOs or trade in the shares / securities of that issuer company.

The moment the merchant banking team(s) gets involved in pre-mandate exercise of an existing listed company/unlisted company, the same should be intimated to the Compliance Officer.

All the employees are permitted to subscribe to the shares / securities in the Initial Public Offerings ('IPOs'), wherein DCAPL is not a merchant banker. The employee has to intimate the Compliance Officer about the details of their application within 24 hours of making the application.

The employee should immediately intimate the allotment details (within 24 hours of credit in their de- mat account), if any, to the Compliance Officer.

While selling the shares / securities allotted in the IPO, the employees shall intimate to the Compliance Officer about the same within 24 hours of selling the shares / securities.

Employees are allowed to participate in Rights Issues lead managed by DCAPL ONLY to the extent of their entitlement but are not entitled to participate in the Rights issue by subscribing through renunciation, thereby becoming a new shareholder of the Company. The Compliance Officer shall regularly monitor the transactions of various employees and report to the Chairman/CEO/ Board of Directors, on special findings, if any.



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Each of the employees, at the time of joining, will intimate to the Compliance Officer their existing holdings in the various securities, in the prescribed formats.

**Financing:** No finance from either DCAPL or any other DCAPL Group company shall be provided or availed by any employee or their immediate relatives for trading in securities.

### **Holding Period**

All Employees and their immediate relative who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the regulations.

### **Grey List / Restricted List**

The compliance officer shall confidentially maintain a "Restricted List / Grey List" of securities which shall be used as the basis for approving or rejecting applications for preclearance of trades.

### **Disclosure Requirements:**

#### **a) Undertaking:**

- At the time of joining DCAPL, an undertaking in the format provided in **Annexure - E**, shall be executed in favour of the company by all employees undertaking that in case he / she has access to or receives "Unpublished Price Sensitive Information" after 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 refrain from dealing in the securities of the client till the time such information becomes public.
- That he/she will not contravene the Code of Conduct for prevention of insider trading as specified by the organization from time to time.
- That he / she shall indemnify the company against any regulatory action initiated against the company for his/her contravention of the rules, regulations and guidelines issued by regulatory agencies.

A similar declaration cum undertaking shall be given by the Employees to the Compliance



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**DIRECTOR**



Officer, every year i.e. as on March 31 of every financial year. The declaration should be submitted within 30 days from March 31 in the format provided in **Annexure - F** hereto, along with the holding statement.

**b) Declaration – Immediate Relatives**

- A declaration should be given by all employees giving details of their immediate relatives and concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which such person has a stake of more than 10%.
- The said declaration shall be given by all employees for the period ending March 31 every year. The format of the declaration is attached herewith as **Annexure G**.
- Any change in the list of immediate relatives and concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which such person has a stake of more than 10% should be intimated to the Compliance Officer immediately. Details of such change shall also be given in the format specified in **Annexure G**.

**c) Statement of Holding – Self and Immediate Relatives**

- At the time of joining, all employees shall furnish demat account statement for self and immediate relatives and concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of Persons in which such person has a stake of more than 10%.
- Additionally, the employees shall submit such demat account statement for self and immediate relatives and concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which such person has a stake of more than 10% as at March 31 every year, within 30 days from the said March 31. In case, the shares are held in physical form, the Employee shall furnish such holdings in the format as given in **Annexure H**.

The Compliance Officer shall ensure that all the declarations / disclosures and other records relating to the compliance of this Code for a minimum period of 5 years.

**Pre-clearance is mandatory for the following types of securities:**

- Purchase/ Sale of Equity & Preference shares (including IPOs and FPOs);
- Rights issue, Open offers, Buy-backs;
- Off-market transfers including gift of securities;
- Investment in Pvt. Equity, AIF, InvITs, REIT etc.;



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**Pre clearance and Holding Period restriction are not applicable for dealing in following instruments:**

- (a) Investments in Fixed Deposits with Banks/ Financial institutions/Companies, Life insurance policies, Provident funds or investments in saving schemes such as National Savings Certificates, National Savings Schemes, Kisan Vikas Patra or any other similar investment;
- (b) Sovereign Gold Bonds/ Government Bonds/ Tax saving bonds;
- (c) Mutual funds;
- (d) Exchange-Traded Fund (ETF)
- (e) NCDs or similar products

#### **CONSEQUENCES OF VIOLATION OF THE CODE**

Any violation of this Code of Conduct by any person to whom this Code applies can lead to sanctions or severe punitive action against the erring person, including wage freeze, suspension or termination of employment / association.

Any employee who trades in securities on the Restricted List / Grey List or does not seek prior permission to trade shall indemnify and hold harmless the Company for any consequences thereof. In addition to termination of employment, the employee shall personally bear the consequences of such default.

Disciplinary action taken by the Company shall be in addition to the action that may be taken by the Securities and Exchange Board of India in respect of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

For DHANAM CAPITAL ADVISORS PVT. LTD.

A handwritten signature in blue ink, appearing to read 'Sharon', is written over a blue line. Below the signature, the word 'DIRECTOR' is printed in blue capital letters.

DIRECTOR



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**Annexure – A**

**DCAPL – INVESTMENT REQUEST FORM**

**Name of the Employee:**

**Client Code :**

**Employee Code :**

Sl.No.	Name of the Security	Date of Purchase	Buy/Sell	Quantity	Price Limit (not including brokerage)
1					
2					
3					
4					

Note: Orders are valid for seven working days only

Nature of Trade : Equity / IPO / FPO / Rights Issue / Others(Pl. specify)

**DECLARATION**

I hereby declare and undertake that;

- I have read and understood the Compliance Rules set by DCAPL with regard to Investments by employees and the above transaction(s) is / are not in contravention of the same.
- I am not in receipt of any “Unpublished Price Sensitive Information” meaning any information which relates directly or indirectly to the above mentioned securities and which published is likely to materially affect the price of securities of the above mentioned securities.
- In case I have access to or receive any “Unpublished Price Sensitive Information” before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I shall completely refrain from dealing in the securities of the client company till the time such information becomes public.
- The intended transaction is on my account or my Immediate Relative’s account or Concern(s), Form(s), Company(s), HUF(s), Trust(s), Association of persons in which the persons to whom this Code is applicable have a stake of more than 10%.
- The said transaction is not on account of any other third party.
- I have not availed any finance from any Group Company for subscribing to the Issue lead managed by Dhanam Capital Advisors Private Limited
- All sale transactions on cash segment are for shares held by me or my connected persons for at least 6 months.
- All purchases of shares will be held by me or my connected persons for a minimum period of 6 months.



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**For DHANAM CAPITAL ADVISORS PVT. LTD.**

*[Signature]*  
**DIRECTOR**


CIN : U66309RJ2024PTC098199



**Signature of Employee:**  
**Date:**

**Signature of Approver:**  
**Approved by:**  
**Date of Approval:**

For DHANAM CAPITAL ADVISORS PVT. LTD.

  
DIRECTOR



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**Annexure - B**

**FORMAT FOR DISCLOSURE OF TRANSACTIONS**

(to be submitted within 2 days of transaction/allotment)

To

The Compliance Officer

Dhanam Capital Advisors Private Limited

Dear Sir,

I hereby inform that

I or my connected persons have bought / sold / subscribed to \_\_\_\_\_ securities as mentioned below on \_\_\_\_\_ (date)

Name of the holder	No. of securities dealt with	Bought / Sold / Subscribed	DP ID / Client ID / Folio No.	Price (Rs.)

In connection with aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance Officer / SEBI any of the following documents:

1. Broker's Contract Note.
2. Proof of payment to / from brokers.
3. Extract of bank passbook / statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. *(Applicable in case of purchase / subscription).*

I declare that the above information is correct and that no provisions of the Company's Code and / or applicable laws / regulations have been contravened for effecting the above said transaction(s).



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**DIRECTOR**

CIN : U66309RJ2024PTC098199



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

Name:

Emp. Code:

For DHANAM CAPITAL ADVISORS PVT. LTD.

A handwritten signature in blue ink, appearing to read 'M. Arun', is written over a blue rectangular stamp that contains the word 'DIRECTOR' in capital letters.



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**Annexure - C**

**FORMAT FOR REPORTING OF DECISIONS NOT TO TRADE AFTER SECURING PRE-CLEARANCE**

The Compliance Officer,

Dhanam Capital Advisors Private Limited

Dear Sir,

I request you to please take on record the reasons for not executing / partially executing trades after obtaining pre-clearance along with the reasons for such decisions.

Given below are the necessary details required for your perusal.

Sl. No.	Date of Approval	Name of Security	Buy/ Sell	Quantity not executed	Reason for not executing / partially executing trade

Thanking you,

Yours Sincerely,

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

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

DATE: \_\_\_\_\_



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For DHANAM CAPITAL ADVISORS PVT. LTD.

A handwritten signature in blue ink, appearing to read 'Shyam', is written over a green rectangular background.

DIRECTOR

**Annexure - D**

**APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD**

The Compliance Officer,

Dhanam Capital Advisors Private Limited

Dear Sir,

I request you to grant me waiver of the minimum holding period of 6 months as required under the DCAPL Code of Conduct with respect to \_\_\_\_\_(no. of shares) of (name of the company) held by me / \_\_\_\_\_(immediate relative and concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which such person has a stake of more than 10%) on \_\_\_\_ (Date). I desire to deal in the said shares on account of \_\_\_\_\_  
\_\_\_\_\_(give reasons). Given below are the necessary details required for your perusal.

Name of the Broker with whom account is held: \_

Trading Account Code: \_\_\_\_\_

Date of Purchase of shares: \_\_\_\_

Thanking You,

Yours faithfully,

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

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

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



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DIRECTOR



(To be submitted by new joinees at the time of joining)

**Annexure - E**

**DECLARATION CUM UNDERTAKING**

To  
The Compliance Officer  
Dhanam Capital Advisors Private Limited

Dear Sir,

Sub: Declaration with regard to Insider Trading.

With reference to the captioned subject, I hereby declare that:

- 1) I have received the DCAPL Code of Conduct for trading in securities and have read and understood the same and I undertake to abide by the same.
- 2) I have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and do confirm and declare that I shall not contravene the same in any manner whatsoever.
- 3) In case I have access to or receive any "Unpublished Price Sensitive Information" before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I shall completely refrain from dealing in the securities of the client company till the time such information becomes public.
- 4) I have made a full and true disclosure regarding trading accounts and shareholdings in my name and in the name of my Immediate Relatives, Concern(s), Firm(s), Company(s), HUF(s), Trust(s), or Association of persons in which the persons to whom this Code is applicable have a stake of more than 10%.
- 5) I undertake to obtain prior clearance from the Compliance Officer for all the trades I may execute in my account, my Immediate Relatives' account and in account of concern(s), Firm(s), Company(s), HUF(s), Trust(s), or Association of persons to whom this Code is applicable have a stake of more than 10% as per the pre-clearance requirement under the Code of the Company. I undertake to submit duly signed Investment Request Form to the Compliance Officer for approval before placing any order(s) in the Securities, if required.
- 6) I undertake to adhere with the minimum holding period requirement of the Code.
- 7) I further undertake not to pass on any unpublished price sensitive information directly or indirectly to any persons or by way of making a recommendation for the purchase or sale of securities. I also undertake not to use unpublished price sensitive information to buy or sell securities of any sort, whether for my own account, my Immediate Relatives' account, Company's account or a client's account.
- 8) I indemnify DCAPL Group and will continue to keep DCAPL Group indemnified against any regulatory action initiated against DCAPL Group on account of my contravention of the rules / regulations and guidelines issued by regulatory agencies.

Name of the Employee :  
Date of Joining :



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2nd Floor, 578. BL House, Mahaveer Nagar,  
Tonk Road, Durgapura, Jaipur, Raj-302018

For DHANAM CAPITAL ADVISORS PVT. LTD.

**DIRECTOR**

CIN : U66309RJ2024PTC098199



Signature of the employee Date:

For DHANAM CAPITAL ADVISORS PVT. LTD.

  
DIRECTOR



0141-4114945



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(To be submitted by existing employees every year as on March 31)

**Annexure - F**  
**DECLARATION CUM UNDERTAKING**

To  
The Compliance Officer  
Dhanam Capital Advisors Private Limited

Dear Sir,

Sub: Declaration with regard to Insider Trading.

With reference to the captioned subject, I hereby declare that:

1. I have read and understood the DCAPL's Code of Conduct for trading in securities and I undertake to abide by the same. I also declare that I have not contravened the same in any manner whatsoever.
2. I have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and do confirm and declare that I shall not contravene the same in any manner whatsoever.
3. In case I have access to or receive any "Unpublished Price Sensitive Information" before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I shall completely refrain from dealing in the securities of the client company till the time such information becomes public.
4. I have made a full and true disclosure regarding trading accounts and shareholdings in my name and in the name of my Immediate Relatives, Concern(s), Firm(s), Company(s), HUF(s), Trust(s), or Association of persons in which the persons to whom this Code is applicable have a stake of more than 10%.
5. I undertake to obtain prior clearance from the Compliance Officer for all the trades I may execute in my account, my Immediate Relatives' account and in account of concern(s), Firm(s), Company(s), HUF(s), Trust(s), or Association of persons to whom this Code is applicable have a stake of more than 10% as per the pre-clearance requirement under the Code of the Company. I undertake to submit duly signed Investment Request Form to the Compliance Officer for approval before placing any order(s) in the Securities, if required.
6. I undertake to adhere with the minimum holding period requirement of the Code.
7. I further undertake not to pass on any unpublished price sensitive information directly or indirectly to any persons or by way of making a recommendation for the purchase or sale of securities. I also undertake not to use unpublished price sensitive information to buy or sell securities of any sort, whether for my own account, my Immediate Relatives' account, Company's account or a client's account.
8. I indemnify DCAPL Group and will continue to keep DCAPL Group indemnified against any regulatory action initiated against DCAPL Group on account of my contravention of the rules / regulations and guidelines issued by regulatory agencies.

Name of the Employee :

Employee Code :

Signature of the employee

Date :-



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For DHANAM CAPITAL ADVISORS PVT. LTD.

DIRECTOR

**Annexure - G**

**DECLARATION – IMMEDIATE RELATIVES**

To

The Compliance Officer

Dhanam Capital Advisors Private Limited

I, \_\_\_\_\_ having my trading account with \_\_\_\_\_ and Trading Code/Unique Client Code (UCC) No. \_\_\_\_\_ do hereby declare that:

(i) The following persons are my immediate relatives: #

Sl.No.	Name	Relationship	Name of the broker with whom account held	UCC/Trading Code
1				
2				
3				
4				
5				

(ii) The persons to whom this code is applicable hold more than a 10% stake in the following concern(s) / firm(s) / companies / HUF / trust / association of persons.

Sl.No.	Name of the concern / firm / company	Type of concern (e.g. sole proprietorship / partnership / company)	UCC / Trading Code
1			
2			
3			
4			
5			



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For DHANAM CAPITAL ADVISORS PVT. LTD.



**DIRECTOR**

CIN : U66309RJ2024PTC098199



(iii) I also undertake that in case of any change in the above mentioned list I shall intimate the same in writing to the Compliance Officer at the earliest.

Name of the Employee :

Employee code :

Signature :

Date:

For DHANAM CAPITAL ADVISORS PVT. LTD.

A handwritten signature in blue ink, appearing to read 'S. Sharma', is written over a blue circular stamp.

DIRECTOR



0141-4114945



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**Annexure – H**

**Details of shareholdings (in Physical Form)**

Name of the Employee:  
Employee code:

Name of the Client		Trading Account No.	
Relation with employee		Name of the Broker	

Sl.No.	Folio No.	Name of the security	No. of shares purchased
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			



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For DHANAM CAPITAL ADVISORS PVT. LTD.



**DIRECTOR**

CIN : U66309RJ2024PTC098199



19			
20			

Signature of the employee

Date :

For DHANAM CAPITAL ADVISORS PVT. LTD.

A handwritten signature in blue ink, appearing to read 'S. G. Sharma', is written over a horizontal line.

DIRECTOR



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