

Policy for prevention of Insider Trading:

- As a Policy company does not allow its employees who are directly involved in clients dealing (namely RMS, Trade Punching etc.) to trade in the Market.
- Generally the Company does not encourage the trading by its employees directly or indirectly (in the accounts of relatives) however Employees can only undertake delivery based trades subject to the prior approval from Compliance Officer.
- All the employees are required to disclose the details of their trading account or the details of their relatives trading account to the compliance officer.
- Any employee who wish to trade must obtain prior approval form the Compliance Officer and such approval shall be applicable for delivery trades only. Such approval shall stand cancelled if employee trades on intra-day basis or in FO/CD segments.

For Shanu Investment

Compliance Officer Name: Santosh Pal