

Sharekhan Ltd. (MASK) Code of Conduct for Prohibition of Insider Trading

Version 3.0	
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Policy reviewed by Compliance Officer:	Mr. Joby John Meledan Date: 05 th Aug 2025
Reviewed By CRO	Mr. Ritesh Patel Date: 20 th Aug 2025
Reviewed By CEO	Mr. Moon Kyung Kang Date: 20 th Aug 2025
Approved by the Board on	20 th Aug 2025
Name of the entity	MASK

INTRODUCTION AND OBJECTIVE

The SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) have come into force with effect from May 15, 2015. Insider Trading involves trading relating to a company or securities ‘listed’ or ‘proposed to be listed’ by an Insider. The terms insider, trading, connected person, unpublished price sensitive information, etc. are as defined under Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades by Designated Employees under the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Code” or “this Code”) pursuant to the Regulations.

The Board of Directors of every intermediary shall ensure that the chief executive officer or managing director shall formulate a code of conduct with their approval to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with the Regulations, adopting the minimum standards set out in Schedule C to the SEBI (PIT) Regulations, without diluting the provisions of these regulations in any manner.

Sharekhan Limited (the “Company”) is a SEBI registered Stock Broker, Depository Participant & Research Analyst.

This Code has been framed inter alia to regulate, monitor and report trading by All the Employees and Immediate Relatives of Employees towards achieving compliance with the Regulations, adopting the minimum standards set out in Schedule C to the SEBI (PIT) Regulations.

Internal policy for Gifts Invitations & Other Advantages (GIOA) and Outside Business Interests

CHAPTER - I PRELIMINARY

- (a) This code shall be called "The Code of Conduct for Prohibition of Insider Trading of "MASK".
- (b) It has come into force with effect from the date of approval of the Board of Directors of Sharekhan Limited.

1. Definitions

- 1.1. "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- 1.2. "Board" means Board of Directors of the Company.
- 1.3. "Company" means MASK.
- 1.4. "**Compliance Officer**" means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.
- 1.5. "**Connected Person**" means,
 - (i). any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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, whether temporary or permanent, with the company, that allows such a 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 the 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
- (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his relative or banker of the company, has more than ten percent of the holding or interest or
- (k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (1.2) is also a partner; or
- (l) a person sharing household or residence with a connected person specified in sub-clause (i) of clause (1.2).

1.6. **“Designated Persons”** shall include

- a) Directors,
- b) Chief Executive Officer and employees upto two levels below Chief Executive Officer of such listed company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information.
- c) Any support staff of Sharekhan Limited such as Compliance, Risk, Research Analyst and Head of all departments who have access to Unpublished Price Sensitive Information.

- d) Any other employee notified/designated by the Compliance Officer in consultation with Governing Board, either for a specific period of time or for an indefinite period of time, based on such person's role, function, designation and seniority and the extent to which such person may have access to Unpublished Price Sensitive Information.
 - e) Immediate Relatives of the persons specified in (a) to (d) above.
- 1.7. **"Grey List"** shall have the meaning as described thereto in this Code (refer point no. 5.6).
- 1.8. **"Generally Available Information"** means information that is accessible to the public on a non- discriminatory basis.
- 1.9. **"Immediate Relatives"** means "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.
- 1.10. **"Insider"** means any person who is:
- (i) a connected Person; or
 - (ii) In possession of or having access to unpublished price sensitive information.
- 1.11. **"Inside Information"** is a certain type of confidential information and is both material and highly sensitive. Generally known only to the employees involved in the transaction and not to be disclosed to the public.
- 1.12. **"Legitimate Purpose"** shall include sharing of unpublished price sensitive information in the ordinary course of business by an Insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), merchant banker(s), legal adviser(s), auditors, insolvency professional(s) or other advisor(s), or consultant(s), provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- 1.13. **"Material financial relationship"** shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.
- 1.14. **"Non-Designated Employee"** Shall include all the employees other than Designated Employees.

- 1.15. **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- 1.16. **"Promoter Group"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- 1.17. **"Proposed to be listed"** shall include securities of an unlisted company: (i) if such unlisted company has filed offer documents or other documents, as the case may be, with the Board, stock exchange(s) or registrar of companies in connection with the listing; or (ii) if such unlisted company is getting listed pursuant to any merger or amalgamation and has filed a copy of such scheme of merger or amalgamation under the Companies Act, 2013.
- 1.18. **"Relative"** means
- (i) spouse of the person.
 - (ii) parent of the person and parent of its spouse.
 - (iii) sibling of the person and sibling of its spouse.
 - (iv) child of the person and child of its spouse.
 - (v) spouse of the person listed at sub-clause (iii); and
 - (vi) spouse of the person listed at sub-clause (iv)
- NOTE: It is intended that the relatives of a "connected person" too become connected persons for the purpose of these regulations. It is a rebuttable presumption that a connected person had UPSI."*
- 1.19. **"Regulations"** means the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 1.20. **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof.
- 1.21. **"SEBI"** means the Securities and Exchange Board of India.

1.22. **“Trading”** means and includes subscribing, [redeeming, switching,] buying, selling, dealing, or agreeing to subscribe, [redeem, switch,] buy, sell, deal in any securities, and "trade" shall be construed accordingly.

1.23. **“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;

NOTE: It is intended that information relating to a company or securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The types of matters that would ordinarily give rise to unpublished price sensitive information have been listed above to give illustrative guidance of unpublished price sensitive information.

CHAPTER – II APPLICABILITY

2. This code is applicable to all secondary market dealings in securities by the Employee (Permanent, Temporary and Contractual) and to their Immediate relatives (Refer point 1.6). It is a mandatory for all the employees and their immediate relatives should do all their transactions through Sharekhan trading account only.

CHAPTER - III CHINESE WALL POLICY

3. **Chinese Wall Policy:**
 - 3.1. As per the SEBI PIT Regulations, the Company has adopted a Chinese wall policy to prevent the misuse of Unpublished Price Sensitive Information in relation to the Company which separates those areas of the Company which routinely have access to UPSI, considered

“inside areas” from those departments which deal with sale/ marketing or other departments providing support services, considered “public areas”. All employee shall adhere to the Chinese wall policy and ensure that confidentiality of Unpublished Price Sensitive Information is maintained at all times.

- 3.2. The employees in the inside area shall not communicate any price sensitive information to anyone in public area, except in furtherance of legitimate purpose, performance of duties or discharge of legal obligations.
- 3.3. The employees in an inside area may be physically segregated from employees in public area. Demarcation of the various departments as inside area may be implemented by the Company.
- 3.4. In exceptional circumstances employees from the public areas may be brought “over the wall” and given confidential information on the basis of “need to know” criteria, under intimation to the Compliance Officer.
- 3.5. The Designated Persons within the Chinese Walls have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Any known or suspected breaches of the Chinese Wall must be reported to the Compliance Officer immediately.
- 3.6. The Compliance Officer shall report to the Managing Director of any breach of Chinese Wall procedures by any person immediately and if the breach is serious also make a report to the Audit Committee of the Company.
- 3.7. Confidentiality of information and procedures to be adopted by all the department of “Sharekhan Limited”. All department of “Sharekhan limited” dealing in confidential information shall adopt and put in place suitable measures (which may include providing restricted access controls, passwords, firewalls, biometric access etc.) to ensure that the confidential information in their possession does not get disseminated either directly, indirectly, covertly or overtly. The head of the department concerned shall be responsible to ensure that adequate security measures are implemented at all places which handle / deal in such confidential / Unpublished Price Sensitive Information either frequently or otherwise.

CHAPTER – IV DISCLOSURES OF INFORMATION

4.1. Disclosure of holdings by (Designated and Non-Designated) employees:

- 4.1.1. At the time of joining the Company, an employee (**Designated and Non-Designated**) shall disclose to the Compliance team, details of his current holdings in securities - excluding Mutual Fund, ETF and Bonds to which the code does not apply. This disclosure is also required for securities held by immediate relatives.
- 4.1.2. is required to read, understand and apprise himself/herself with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any revisions thereof.

4.2. Disclosure of Information by Designated Persons.

All the Designated Persons shall be required to submit the following personal information to the Compliance Officer on an annual basis, as and when the information changes:

- 4.2.1. Permanent Account Number or any other identifier authorized by law of the following persons.
- 4.2.2. Immediate Relatives as per clause 1.6 above.
- 4.2.3. persons with whom such designated person(s) shares a material financial relationship (i.e. a relationship in which the person receives any kind of payment from a Designated Person (such as by way of a loan or gift from a Designated Person) during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such a Designated Person. However, relationships in which the payment is based on arm's length transactions is excluded.
- 4.2.4. Phone, mobile and cell numbers which are used by them.
- 4.2.5. Names of educational institutions from which Designated Persons have graduated (to be disclosed on one-time basis).
- 4.2.6. Names of their past employers (to be disclosed on one-time basis).
- 4.2.7. The disclosures made under this chapter shall be maintained by Sharekhan Limited for a minimum period of five years, in such form as may be specified.

4.3. “Annual Disclosure”

- 4.3.1. Every Designated and Non-Designated employee of the Company shall on an annual basis, disclose to the Company, declaration and the details of all holdings of Securities held by him including holdings of their Immediate Relatives on or before April 30 (for year ended March 31).

CHAPTER – V

5. Mechanism For Prevention of Insider Trading

- 5.1. **Internal controls:** The Company has adopted a system of internal controls which mainly consists of the following, to prevent Insider Trading:

- 5.1.1. All employees who have access to Unpublished Price Sensitive Information are identified as designated employees.
- 5.1.2. All Unpublished Price Sensitive Information shall be identified, and its confidentiality shall be maintained by designated employee and others who have knowledge of unpublished price sensitive information.
- 5.1.3. Adequate restriction shall be placed on procurement, communication and sharing of unpublished price sensitive information by designated employees and others who have knowledge of Unpublished Price Sensitive Information.
- 5.1.4. List of employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreement shall be executed or notice shall be served to all such employees and persons.
- 5.1.5. Audit Committee shall review once in a financial year, the process to evaluate effectiveness of the above said internal controls and shall verify that the system for internal control are adequate and are operating effectively.

5.2. Pre-clearance of Trade

- 5.2.1. All employees who intend to deal in Secondary Market (Equity/Derivatives) either in their own account or in the name of their Immediate Relatives shall obtain preclearance approval from compliance before placing the transaction. After the approval is received, they can execute the trades. If rejected, then should not proceed for execution of trades.
- 5.2.2. Prior to approving any trades, the compliance officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information.

5.3. Holding Period

- 5.3.1. For Trading under securities 30 calendar days holding period is applicable (excluding date of Purchase/Allotment and Sale) for all employees and their immediate relatives.
- 5.3.2. Designated person who is a connected person of the listed company and is permitted to trade in the securities of such listed company, 6 months holding period is applicable and shall not execute a contra trade for such securities. Provided that this shall not be applicable for trades pursuant to exercise of stock options.
- 5.3.3. Designated Person who is a connected person of the mutual fund/asset management company/trustees and is permitted to trade in the units of such mutual fund, 2 months holding period is applicable and shall not execute a contra trade.

5.4. Approval Validity

- 5.4.1. The pre-clearance approval shall be valid for the 5 trading days from the receipt of approval. After the approval of pre-clearance is given and if the order is not executed within the given period the employee shall obtain a fresh pre-clearance from compliance.

5.5. Exceptions

- 5.5.1. In case the sale of Securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing the reasons in this regard provided that such relaxation does not violate the Regulations.
- 5.5.2. IPO allotment, Mutual Fund, ETF and Bonds are not applicable for this code, except for point No 5.3.3.

5.6. Restricted/ Grey List: To monitor trading in securities based on inside information, the Company shall restrict trading in certain securities and designate such list as restricted/grey list as below:

- 5.6.1. The security of a listed company shall be put on the restricted/grey list if the Company is handling any Merchant Banking assignment or is preparing an appraisal report for the listed company and is privy to price sensitive information.

- 5.6.2. The research team will give a list of companies for which he/she is doing research. The updated list will be sent to the Compliance Officer / Team within 2 working days. Upon receiving such a list, the Compliance Team will include these companies in the grey list.
- 5.6.3. Five days after the report is submitted and the information is public; the grey list will be revised by removing the company from the restricted/grey list.

5.7. Responsibilities and restrictions imposed on Designated Persons are:

- 5.7.1. Designated Persons shall not communicate, shall not provide or allow access to any Unpublished Price Sensitive Information, relating to a report to the Company or Securities listed or proposed to be listed, to any person including other Insiders except where such communication is in furtherance of Legitimate Purpose, performance of duties or discharge of legal obligation.
- 5.7.2. Not to pass on any Price Sensitive Information to any person (including but not limited to his or her family members, friends, business associates etc.) directly or indirectly by way of making recommendations for Trading in Securities.
- 5.7.3. Not to communicate Price Sensitive Information in situation in which there would be uncertainty as regards conflict of interest or the possibility of misuse of the information.
- 5.7.4. Not to discuss or disclose Price Sensitive Information in public places.
- 5.7.5. Not to disclose Price Sensitive Information to any Employee who does not need to know the information for discharging his or her duties or responsibilities.
- 5.7.6. Every Designated Person is required to maintain strict confidentiality of all Unpublished Price Sensitive.
- 5.7.7. All data, documents, information, forms, records, files (physical as well as soft files) are required to be kept secure and confidential by all the Designated Persons. All information within the organization shall be handled on a need-to-know basis.

5.8. Roles and Responsibility of the Compliance Officer

- 5.8.1. Compliance Officer has to administer this Code of conduct and monitor compliance with the SEBI PIT Regulations. The Compliance Officer for the purpose of this Code shall report to the Governing Board of the Company, and Chairman of the Audit Committee not less than one year basis or on such other intervals as decided by the Governing Board.

- 5.8.2. The Compliance Officer shall ensure the adherence of all the policies, codes, processes and procedures formulated and adopted by the Company for the preservation of UPSI and monitor the compliances and implementation of all the provisions specified in the SEBI PIT Regulations.
- 5.8.3. The Compliance Officer shall provide a report to the Board of Directors through the audit committee with regard to implementation and operation of this Code periodically and at least once in every financial year.
- 5.8.4. The Compliance Officer shall obtain all the declarations/ information as may be required from time to time from the identified Designated Persons for ensuring compliance of the SEBI PIT Regulations.
- 5.8.5. Upon the violations of this Code, the Compliance Officer shall seek written explanation and any such violations shall be reported by the Compliance Officer to the Audit Committee or Governing Board, upon becoming aware of the same, based on the nature of the violation.

5.9. Maintenance of Records & Registers:

The Compliance Officer shall maintain:

- 5.9.1. Register of pre-clearance of Trading of Securities and record therein the name and designation of the employee submitting the Pre-clearance application, date of the application, date & time of receipt of the application, nature of the transaction, number of Securities, consideration value, name of the dependent family member if the transaction is in the name of the dependent family member and date & details of the actual transaction.
- 5.9.2. Register of waiver of restriction on holding investment in the Securities and shall record thereon the name of the employee/details of Securities for which waiver is granted, date of waiver and the ground of the waiver.
- 5.9.3. Records of all the declarations given by the employees and their dependents shall be maintain for a minimum period of Five years.
- 5.9.4. unpublished price sensitive information and ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant. Transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

5.10. Disciplinary Action in case of the violation of this Code of conduct

- 5.10.1. Any violation in code of conduct by the employee or their immediate relatives, will be subject to disciplinary action including imposition of wage freeze, suspension, recovery, levying penalty, termination of employment, etc.
- 5.10.2. If observes any violation of Regulations, the Compliance Officer shall inform to the Board of such violation at regular intervals.
- 5.10.3. Compliance shall maintain a database of the violation of the Code by the employees and immediate relatives of employees that would entail initiation of appropriate action against them after recording reasons for such violation in writing.
- 5.10.4. In case it is observed that there has been a violation of SEBI PIT Regulations by designated person who is a connected person of a listed company, the same shall be promptly reported to the Stock Exchange by the Compliance Officer as per format given in **Annexure A**. Profits obtain from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

SEBI references:

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Last amended on December 06, 2024]

Reporting to Stock Exchanges regarding violations under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC). dated July 23, 2020

Annexure A

Report by (Name of the listed company/ Intermediary/Fiduciary) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015		
[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015		
For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]		
Sr No	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	<p>A. Details of Designated Person (DP)</p> <p>i Name of the DP</p> <p>ii PAN of the DP</p> <p>iii Designation of DP</p> <p>iv Functional Role of DP</p> <p>v Whether DP is Promoter or belongs to Promoter Group</p> <p>B. If Reporting is for immediate relative of DP</p> <p>i. Name of the immediate relative of DP</p> <p>ii. PAN of the immediate relative of DP</p> <p>C. Details of transaction(s)</p> <p>i. Name of the scrip</p> <p>ii. No of shares traded and value (Rs.) (Date- wise)</p> <p>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</p>	

	<p>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</p> <p>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</p>	
4	Details of violations observed under Code of Conduct	
5	Action taken by Listed company/ Intermediary/ Fiduciary	
6	Reasons recorded in writing for taking action stated above	
7	Details of the previous instances of violations, if any, since last financial year	
8	<p>If any amount collected for Code of Conduct violation(s)</p> <p>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p><u>In case of online:</u></p> <p>Name of the transferor</p> <p>Bank Name, branch and Account number</p> <p>UTR/Transaction reference Number</p> <p>Transaction date</p> <p>Transaction Amount (in Rs.)</p> <p><u>In case of Demand Draft (DD)</u></p> <p>Bank Name and branch</p> <p>DD Number</p> <p>DD date</p> <p>DD amount (in Rs.)</p>	
	Any other relevant information	

Date:

Place:

Name and Signature of Compliance Officer:

PAN:

Email ID:

Gifts Invitations & Other Advantages (GIOA)

Regulations & Guidelines:

Internal Policy & Procedure for Gifts Invitations & Other Advantages

Process Steps/Description:

Gifts Invitation & Other Advantages Policy	G & I Employee Approval Form
(Gifts Invitation & Other Advantages Policy)	(G&I Approval Form)

Gifts Invitation & Other Advantages procedure is critical component of compliance device as regards fight against corruption. This procedure aims at making the employees aware of their own responsibilities in a field where non-compliant behaviours could expose the employee to legal and highly challenging reputational risk.

Offering gifts and invitation to holders of public function can only be considered for exceptional circumstances and pre - approval is required.

- Gifts given – the limit is cumulative value INR 6,000 per natural person, per annum, per staff member.
 - Gifts received – the limit is cumulative value INR 6,000 per natural person, per annum per staff member.
 - Invitation given – the limit is cumulative value INR 6,000 per natural person, per annum, per staff member.
 - Invitation received – the limit is cumulative value INR 6,000 per natural person, per annum, per staff member.
- 1) The employee have to report the gifts / invitations received / offered from / to the clients / vendors to EIT team in the prescribed format of below threshold limit of Rs. 6,000 per person, per annum, per staff.
 - 2) An employee receives / offers the gifts / invitations from / to the clients / vendors more than the threshold limit of Rs. 6000 per person, per annum, per staff then the employee have to take prior approval by sending the G&I approval form (Annexure II) to EIT Team.

If the request form is approved the employee can accept / send the gifts / invitations from / to the clients / vendors.

Or

If the request form is rejected the employee has to return the gifts / invitations received from the clients or should not offer the gifts / invitations to the clients / vendors.

Outside Business Interests

- Outside Business activities is intimated to employees, whoever is doing such activities need to contact Compliance Team for further compliance of the same.
- Submission form (Appendix III) is provided to those employees who are currently engaged in such activities apart from current job at MASK.
- They are required to provide their employee code along with Designation.
- Employee needs to provide information about their outside business activities –
Whether he holds office,
Whether he has intention to hold a new office,
Whether corporate office is held on private basis,
Any other office, he holds or any external activity at his end,
Employee needs to provide Company's name in which he holds such office on a private basis,
Whether such company is listed or not,
What kind of Business activity he is performing,
Type of office he holds at that place,
Any projected date for expiry of office,
Relation between Sharekhan and Company in which employee is associated,
Whether the employee considers such outside business activity as conflict of interest between his / her work and with Sharekhan.
- Compliance team will send the submitted form signed by employee along with the justification to the Department Head which needs to be signed along with his/her justifications if any.
- After relevant Employee and the Department Head signs document, the same goes to Chief Compliance Officer for signing along with his/her justifications.
- If Chief Compliance Officer doesn't find any issues in such activity done by employee, then procedure gets completed fully and approved.
- If Chief Compliance Officer find any issues, the same is moved to Committee for final decision.