



# **COMPOSITE SECURITIES LIMITED**

## **POLICY ON INSIDER TRADING**

- A) In view of strict compliance requirements all clients are required to make self-declaration whether.
- a) Whether they are promoters / directors or relatives of the directors / promoters of any listed company.
  - b) Whether they are working as an employee with any listed company.
  - c) Whether they are privy to any sensitive information for any company for any reason.
  - d) Whether as an acquirer / seller of any share they are privy to any information by any reason which can be deemed as insider information as defined under SEBI regulations.

All such clients are required to inform the dealers / Head office before transacting in any shares which may be covered within the regulations governing insider trading.

- B) All dealers are required to inform the senior management immediately on noticing any unusual trading activity by any client either because of substantive quantities or due to repeat orders or intraday / overnight profits by any client.

Such transactions will be enquired into on regular basis at Head office by the senior management and suitable steps will be taken to stop such activities