

SANKALP SHARE BROKERS PVT. LTD.

SEBI-INSIDER TRADING CODE OF CONDUCT

We have a very close grip on the entire operation of the Company. Our turnover is having a mix of both proprietary comprising arbitrage / jobbing and client turnover. Also we do not entertain any walk-in client. Entire operation is monitored by the Directors, Abhisek Prahladka & Sonia Prahladka.

However we have set the following guidelines for the employees and client:-

1. Exercise abundant caution while dealing in low priced illiquid securities not to allow taking large positions in those securities across all user ID's .
2. Ensure that any client taking large position in any script should not be employee of the company or taking position on behalf of promoter / director of the company.
3. Routine enquiries conducted by the Exchange to track any insider trading to be complied with immediately by providing all the details .
4. If any thing such as insider is observed by the Compliance officer , SEBI shall be informed by the firm with out delay .
5. Employees are strictly prohibited to encourage or circulate rumors or unverified information obtained from client , industry , any trade or any other sources without verification . Access to blogs/ chat forums/ Messenger sites etc. is strictly prohibited and no access is made available to any employee . Also the employees are strictly instructed that any market related news received by them either in their official mail / personal mail /blog or in any other manner are not forwarded at all and in exceptional cases if required they are forwarded only after the same is approved by the Compliance Officer.

We are fully cautious for prevention of Insider trading as required by SEBI .