

EMPLOYEES' INVESTMENT POLICY

EMPLOYEE INVESTMENT POLICY

INTRODUCTION

The purpose of this policy is to set forth prudent standards to be followed by all the employees when doing their Personal Investment Transactions. Accordingly, this policy provides standards and specifies investment practices, that are either prohibited or subject to special constraints. Any exceptions to this Policy require prior approval of the respective Unit Head of the Company and Compliance Officer.

Pursuant to SEBI (Prohibition of Insider Trading regulations), 2015, “Insiders” are defined as any person who is, or was, connected with a company or is deemed to have been connected with the company and who is reasonably expected to have access to unpublished price sensitive information (“UPSI”) in respect of securities of a company, or who has received or has had access to such unpublished price.

Also 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himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

Chiranjiv Capital Services Limited (hereinafter “Company”) by virtue of the services provided is deemed to be ‘*connected person*’ and puts it in possession of unpublished price sensitive information. Hence, the employees and officials engaged in providing services, for and on behalf of Company, to its clients are also covered under the above definition.

OBJECTIVE OF THE POLICY

The purpose of this Policy is to prevent misuse of UPSI and to establish guidelines and approval requirements for employee’s personal investments.

Employees may never engage in personal transactions, which may conflict or appear to conflict with the interest of the Company or the Company’s clients.

Failure to comply may result in disciplinary action, including termination for cause. Therefore, employees should contact the Compliance Officer for any further clarification regarding this policy. In this regard, Covered Persons are expected to adhere not only to the letter, but also the spirit of the policies contained herein.

POLICY GUIDELINES

- The employees and officials may purchase and sell investments for their personal or family accounts as long as the transactions are consistent with applicable laws, regulations and this Policy.
- All investment decisions must be based solely upon publicly available information.

Personal Investment transactions should focus on long term investment rather than short-term speculation in the capital market. It's essential to be vigilant in order to prevent any conflicts of interest or the perception of such conflicts with the activities of Company or its client companies.

- The Company employees will not use their position to obtain favored treatment to buy or sell securities for their own or family accounts.
- Employees must never engage in personal transactions, that conflict or appear to be in conflict with the interest of the Company or its clients, such as, but not limited to, the following:
 - No employee may purchase or sell a security on the basis of knowledge of a UPSI acquired while providing services or any probable change in investment attitude and consequent action by Company L with respect to a Client's security.
 - Employees who have knowledge that Company is effecting or proposes to have any dealing with a company or in the security of any company, then they must refrain from conducting personal transactions in such security.

For the purpose of the above, **personal investment transactions** are purchase or sale of all types of securities as defined below for:

- The employee's own account. The employee, here includes Permanent, Contractual and Temporary employees of Company;
- Accounts of individuals or third parties for whom the employee provides investment discretion or advice;
- Any member of the employee's immediate family and the employee's dependents;
- Any legal entity in which the employee has a direct or indirect beneficial interest and has power to make investment decisions; or
- The benefit of an unrelated third party (e.g. a charity) at the direction of any employee (other than in the capacity of an employee).

Securities are defined as stocks, notes, bonds, closed-end mutual funds, debentures, and other evidences of indebtedness, including senior debt, subordinated debt, commercial paper, investment contracts commodity contracts, futures and all derivative instruments such as options, warrants, and indexed

EXEMPTIONS UNDER THIS POLICY

1. Saving deposit, current deposit, notice deposit, time deposit, maturity-designated time deposit, time postal deposit, and mutual funds.
2. Investment other than in securities, not in conflict with the interest of Company or any of its clients.

CONFIDENTIAL INFORMATION AND MISUSE OF UPSI

Customer relationships and information that they share, either it be personal or relating to their businesses, proprietary and confidential, should be treated in the strictest confidence, making every effort to avoid intentional or unintentional disclosures. Any inappropriate disclosure and misuse of any UPSI either in relation to any customer, or otherwise could expose Company and its representatives to severe regulatory and financial obligations.

Hence, Company ensures to protect the confidentiality of each customer's Confidential Information in the same manner as they protect the confidentiality of their own proprietary and confidential information of similar nature. It takes all reasonable measures to restrain its representatives from prohibited or unauthorized disclosure or use of the Confidential Information. This is required to avoid the appearance of impropriety, as well as to comply with the necessary laws, rules and regulations.

The Confidential Information should be handled on a "need to know" basis. This means that such Confidential Information should be disclosed only to those within Company who need the information to discharge their duties.

Confidential Information would mean and include all non-public information disclosed, either directly or indirectly, by the clients or third parties, for and on their behalf, to Company, or any information independently developed based on knowledge and data obtained while dealing with such clients.

CONFLICT OF INTEREST

Company employees have a responsibility to ensure that their personal investment transactions do not conflict with their corporate and client obligations. Therefore, employees must not buy or sell a security based on knowledge of:

- A potential change in investment strategy and the subsequent actions of the company regarding that security.
- The Company's plans to execute transactions in that security or any other actions that may materially impact its price.
- The Company completing any transaction that could materially impact a specific company or security.

NECESSARY REPORTING

The Company employees are required to:

1. Acknowledge receipt of this policy;
2. Trading by employees shall be subject to preclearance by the compliance officer
3. Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price-sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
4. Certify on an annual basis that the employee has complied with the requirements of the Policy and that he/she has precleared and disclosed or reported all personal securities transactions required to be disclosed or reported pursuant to the requirements of this Policy, to the Compliance Officer.

POLICY ENFORCEMENT

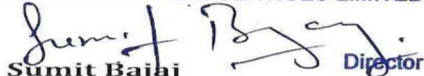
The misuse of confidential information may violate contractual obligations of Company and its employees, local securities laws, and/or other legal and regulatory requirements. Company employees who violate securities laws by purchasing or selling securities based on UPSI may subject themselves to severe civil and criminal penalties. These penalties may also be applicable to those who “tip” or otherwise assist others in executing transactions. Additionally, even the appearance of misusing of confidential information can be extremely damaging to the reputation of Company and/or its employees. Therefore, a failure to comply with the policies and procedures set forth in this Policy may be grounds for disciplinary action, including termination of employment for cause.

MONITORING

The Company is committed to diligently monitoring the personal investment activities of its employees and reviewing their periodic reports. The Compliance Officer will oversee employees; personal investment transactions. Any deviations from the policy requirements will be brought to the employees’ attention for follow-up and resolution (with a copy to be supplied to the employee’s supervisor).

For ***Chiranjiv Capital Services Limited***

For CHIRANJIV CAPITAL SERVICES LIMITED


Sumit Bajaj
Director
DIN : 10815454

CHIRANJIV CAPITAL SERVICES LIMITED

📍 #401, Surya Kiran Building, KG Marg, Connaught Place, New Delhi - 110001
☎ +91 9910613098 | ✉ chiranjivcapital@gmail.com | 🌐 www.chiranjivcapital.com

CIN: U70200DL2025PLC458286