

Shakti Securities

Policy for Prevention of Insider Trading

"Insider trading" is a term that usually associates with illegal conduct. But the term actually includes both legal and illegal conduct. The legal version is when corporate insiders—officers, directors, and employees—buy and sell stock in their own companies. When corporate insiders trade in their own securities, they must report their trades to the Securities Market.

Illegal insider trading refers generally to buying or selling a security, in breach of a fiduciary duty or other relationship of trust and confidence, while in possession of material, nonpublic information about the security. Insider trading violations may also include "tipping" such information, securities trading by the person "tipped," and securities trading by those who misappropriate such information.

In terms of the SEBI (Prohibition of Insider Trading) Regulations, 1992 and any notifications / amendments issued thereafter, we have not engaged in any type of insider trading activities which is prohibited under the said regulation and notifications issued for such purpose.

We also declared that we / connected person (defined under regulation 2(c) of SEBI (Prohibition of insider trading) Regulations, 1992) have not connected / treated as a insider (defined under regulation 2(e) of SEBI (Prohibition of insider trading) Regulations, 1992 "any person who is or was connected with the company or is deemed to have been connected with the company, and who is reasonably expected to have access to unpublished price sensitive information in respect of securities of company, or who has received or has had access to such unpublished price sensitive information")