## Policy on Insider Trading

We do not have any accounts where in any of the employees of listed companies who may have access to insider information and we have instructed very specifically that if any of our client is buying /selling in specific stock in larger quantities such information is kept confidential and not circulated. However, our trading is not retail client base and you observe our trading that buy /sell of the shares is done through Automated Trading Software.

There is no possibility of any of our clients to have an access to insider information of any listed companies.