

**"CODE OF CONDUCT OF PREVENTION OF INSIDER TRADING"**

**Policy Made on 10<sup>th</sup> April, 2011**

**Reviewed on 22<sup>nd</sup> July, 2013**

The below mentioned policy on INSIDER TRADING has been approved by the Board of Directors in their meeting. All the employees are required to follow the same and take due care for its proper implementation.

1. No person shall directly or indirectly use or employ in connection with the issue or purchase or sale of any security listed or proposed to be listed in the recognized Stock Exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of SEBI (Prohibition of Insider Trading) Regulations, 1992 or rules made there under.
2. All the persons shall maintain confidentiality of all price sensitive information & shall not pass such information directly or indirectly by way of making of any recommendation for the purchase or sale of that security.
3. Price sensitive information to be handled in the office on the "need to know" basis only. Any passing of the information to any another person should be with the written permission of the compliance officer.
4. Files containing confidential information shall be kept in secured files and premises & the computer files / files in electronic media shall be adequately secured by login or a password.
5. No person shall discuss, talk or communicate any price sensitive information to anyone in "public area".
6. Any person shall not use price sensitive information for buying or selling of securities of any sort, whether for their own account or their relative's account or organization's account.
7. If any of the client of the company is a listed entity, then, all client who intend to deal in this listed Company (which is client of CCSPL) then the client shall take pre-clearance for such a transactions as described under the Regulation of SEBI.
8. Any persons who trades in securities or communicates any information or counsels any person in trading in securities in contravention of code of conduct may be penalized & action may be taken under the SEBI Regulations.
9. In case of any observation regarding violation of code of conduct, the same shall be brought to the notice of Compliance officer or SEBI.

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