

**RAJESH BAHETI**

1303, 13th Floor Lodha Supremus, Dr. E. Moses Road, Worli Naka, Worli, Mumbai 400 018 Tel.  
No.: (022) 24825700 Fax No.: (022) 24901323

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**“CODE OF CONDUCT OF PREVENTION OF INSIDER TRADING”**

RB in this document shall mean M/s Rajesh Baheti, Commodity Broker having membership with MCX bearing registration No. 16460.

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

**Reviewed on 10<sup>th</sup> June, 2016**

The below mentioned policy on INSIDER TRADING in pursuance of Regulation 9(1) of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 has been approved by Proprietor on June 10, 2016. All the employees are required to follow the same and take due care for its proper implementation.

**Preservation of “Unpublished Price Sensitive Information”**

- All Proprietor, officers and designated employees of RB shall maintain the confidentiality of all Price Sensitive Information. They must not pass on such information directly or indirectly to anyone unless it is required in the ordinary course of business or under any law.
- Unpublished Price Sensitive Information should be handled on a “need to know” basis, i.e., Price Sensitive Information should be disclosed only to those within RB who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

**Prevention of Misuse of Price Sensitive Information**

- Designated employees/officers of RB shall not use Unpublished Price Sensitive Information to buy or sell any commodity, whether on their own account, on account of their dependent relative and firms/HUF/trusts/companies wherein the designated employee/officer or his/her dependent relative(s) have controlling interest, on RB’s account or any client’s account.
- No person shall discuss, talk or communicate any price sensitive information to anyone in “public area”

**Appointment of Compliance Officer & his Duties**

- RB shall appoint a Compliance Officer who shall be a senior level employee reporting to the Proprietor.
- The Compliance Officer shall be responsible for setting forth policies and procedures and monitoring adherence to the rules for the preservation of “Unpublished Price Sensitive Information” and the implementation of this code of conduct under the overall supervision of the Proprietor.

Regd Office: Shop F-35, Ratan Mall Shopping Complex, Chaderghat High School Lane, Abids,  
Hyderabad Andhra Pradesh Pin Code: 500 001 Tel. No.: (040) 64528590



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- The Compliance Officer shall assist the proprietor and employees in addressing any clarifications regarding SEBI (Prohibition of Insider Trading) Regulations, 2015 and this code of conduct
- In case of any deviation from this Code of Conduct, Compliance Officer shall keep the Proprietor or such other senior personnel authorized by the Proprietor informed about the same. The violation shall also be reported to the SEBI.

**Violation of the Code of Conduct for Prevention of Insider Trading**

- In case of any observation regarding violation of code of conduct by Proprietor/officer/designated employee, the same shall be immediately brought to the notice of Compliance Officer.
- Proprietor/ any officer/ designated employee of RB who violates the Code of Conduct for Prevention of Insider Trading may be subject to disciplinary action by RB, which may include warning, salary freeze, suspension or dismissal.
- The action by RB shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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