

**Aseem Infrastructure Finance Limited (AIFL) – Prevention of Insider Trading**

**Policy Owner:** Head – Legal and Compliance

**Last reviewed:** June 2020

## **AIFL – Policy for Prevention of Insider Trading**

### **1. Introduction**

The Reserve Bank of India vide its circular RBI/2015-16/12 DNBR (PD) CC.No.053/03.10.119/2015-16 dated July 01, 2015 issued the “Non-Banking Financial Companies – Corporate Governance (Reserve Bank) Directions, 2015” and the Securities and Exchange Board of India (SEBI) issued the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, which cover Insider trading restrictions.

### **2. Purpose of the Policy**

The Policy for Prevention of Insider Trading (“**Policy**”) is framed by Aseem Infrastructure Finance Limited (“**AIFL**”) recognizing its responsibility to prevent Insider Trading and Unfair Trade Practices. The Board of AIFL formulates this Policy to lay down procedures for dealing in securities on the basis of undisclosed Price Sensitive Information. It also ensures that persons connected to AIFL do not profit by dealing in securities on the basis of unpublished Price Sensitive Information.

### **3. Measures to be taken for Prevention of Insider Trading**

Responsible Officer: Head - Legal & Compliance shall be Compliance Officer for the purpose of this Policy. In his absence, Company Secretary of the Company shall be responsible officer for implementing the said Policy.

### **4. Functions of the Responsible Officer**

- (a) The Responsible Officer shall set forth policies and procedures and monitor adherence to the Rules for preservation of "**Price Sensitive Information**", Price Sensitive Information shall mean any information which relates to the internal matters of a company and is not disclosed by the company in the regular course of its business.
- (b) Identify transactions involving listed companies and taking decisions on whether the proposed transactions could affect the prices of the securities of the listed companies in the market.
- (c) Putting the securities of any such identified listed company in the Restricted List of Securities.
- (d) Addressing any clarifications regarding the Policy.

### **5. Restricted List of Securities**

- (a) In order to monitor trading in client securities based on inside information, the company shall restrict trading in certain securities and designate such list as the Restricted List.
- (b) Security of a listed company shall be put on the Restricted List if AIFL is in receipt of any Price Sensitive Information.
- (c) Head – Legal & Compliance shall identify the securities to be put in the Restricted List.

- (d) The Restricted List shall be made available to the employees from time to time. Any employee wanting to trade in such securities shall have to take prior permission from the Compliance Officer.

**6. Process of notifying additions or changes in the Restricted List**

- (a) The concerned employee of AIFL who is in receipt of Price Sensitive Information shall inform the Head – Legal & Compliance in writing/ email immediately on receipt of any Price Sensitive Information.
- (b) The Head – Legal & Compliance shall put the securities of such companies in the Restricted List based on the information provided.
- (c) In any event the Head – Legal & Compliance may at his discretion, put any other company on the Restricted List.
- (d) The concerned employee of the Company handling the transaction / deal shall be responsible for intimating the Head – Legal & Compliance about the removal of a specified security from the Restricted List.

**7. Process of Removal/ Deletion from Restricted List**

The Head - Legal & Compliance is authorized to delete companies from the Restricted List based on discussions with the concerned employee in possession of the Price Sensitive Information. In any event, the Restricted List shall be reviewed by the Compliance Department on a quarterly basis.

**8. Consequences of notifying securities in the Restricted List**

Once a security is put in the Restricted List, all the relevant provisions of the AIFL's Policy for Prevention of Insider Trading shall become applicable.

**9. Consequences of violation of the Policy**

Any violation of the above Policy by any person to whom it applies can lead to severe punitive action against the erring person, including wage freeze, suspension or termination of employment/ association.

**10. Review, Modifications**

Compliance with respect to all aspects of the Policy for Prevention of Insider Trading Policy shall be reviewed by the Board annually. Unless there is any change in the regulations which may require a review of the policy sooner.