



CODE OF BUSINESS CONDUCT AND ETHICS FOR DIRECTOR'S, MANAGERIAL PERSONNEL AND EMPLOYEES

THIS CODE SHALL COME INTO FORCE WITH EFFECT FROM **1ST DAY OF APRIL, 2011.**

Applicability and object of the code:

This self-regulated Code is applicable to all Directors and Employees (both Permanent and Temporary staff) of the Company i.e. **Sajag Securities Pvt. Ltd.** to maintain the highest ethical standards and to govern the conduct of the employees with regard to circulation of unauthenticated news or rumors as it can do considerable damage to the functioning and behavior of the stock market and can distort the price discovery mechanisms. The code is made in compliance with the SEBI circular no. Cir/ISD/1/2011 dated 23rd March, 2011 in connection with Unauthentication news circulated by SEBI Registered Market Intermediaries through various modes of communication by its employees/ directors.

"No Director or Employee shall –

- (i) communicate or counsel or procure, directly or indirectly, any unverified information or rumors related to securities, to any other person(s).
- (ii) encourage or circulate rumours or unverified information obtained from client, industry, any trade or any other source without verification.
- (iii) Access to blogs, chat forum and other sites and if accessed shall either be restricted under supervision of compliance officer or should not be accessed at all.
- (iv) Use any blogs/chat forums/ messenger sites for divulging any unverified information or for circulation any kind of rumors in the market.
- (v) circulate any market related news received by him/her either in their official mail/personal mail/blog or in any other manner, and such information should be forwarded only after the same has been seen and approved by the Compliance Officer of the company.

The employee is required to maintain the log of such communication on internet/blogs/chat/forums/messenger sites in all cases including the usage under the supervision of compliance officer and shall provide a copy of the same to compliance officer immediately.

However, notwithstanding anything contained in above mentioned rules will be applicable to any sort of communication required by the employee for/or in relation to any assignment of the Company within ordinary course of business or for pursuing any research for the development or/ in the interest of the company

This Code can be modified/amended/alterd by Compliance Officer of the company. As required from time to time in compliance of the relevant provisions/regulations in this regard.

Penalty for contravention of internal code of conduct

Any employee/ officer / director who circulate or counsel or communicates any unverified information or rumors for trading in securities, in contravention of the above mentioned code of conduct, shall be deemed to have violated the provisions contained in SEBI Act/Rules/Regulations etc and shall be liable for appropriate action.

**For and on behalf of the
Sajag Securities Pvt. Ltd.**

Sd/-

**Nilesh Ganatra
(Compliance Officer)**

Note: The aforesaid policy is approved in the Board meeting held on 15.01.2019