



## *Bhogilal Trikamlal Securities Pvt. Ltd.*

MEMBER: BSE LTD. & NSE LTD.

R-717/721, Rotunda Bldg., B. S. Marg, Fort, Mumbai - 400 023. || Tel.: 2272 1907 • Fax: 2272 2966

---

### **Front Running & Insider Trading Policy**

- 1] All dealers in the dealing room shall not divulge or disclose any information of any trades executed/ or being executed to anyone. Top most secrecy shall be observed.
- 2] All dealers in the dealing room shall not be allowed to use cellular phones during market hours or during post-closing hours.
- 3] The Retail & the HNI desk shall not be allowed to do a trade in the shares until the FI's/ FII's/DFIS have completely executed their transaction during the day in the dealing room.
- 4] All conditions mentioned in the 'Dealing Room Policy 'shall be observed.
- 5] If dealers want to purchase or sell any share/ debt instrument they shall have to take prior approval from the Compliance Officer/Designated Director and shall be able to purchase shares only within 48 hours after which new approvals shall have to be taken.
- 6] All dealers in the dealing room desk shall not be allowed to have trading accounts other than at Bhogilal Trikamlal Sec. P. Ltd.
- 7] Near relative of dealers shall also have to take prior approval to do a transaction in the equity/debt markets as per clauses (5).
- 8] All dealers in the dealing room shall have to submit their annual return copy along with Stock transaction statement (CAS) & Bank Statement for inspection to the Compliance Officer / Principal Officer.
- 9] Incase the above Policy rules are not followed by the respective members of staff/professional's; the matter shall be referred to the Board of Directors / Compliance Committee & due actions shall be initiated.