

K. M. Global Financial Services Pvt. Ltd.

In case it is observed by the Company / Compliance Officer that there has been a violation of these Regulations, and that the violation is grave, the same shall be informed by the organization / Compliance Officer to SEBI.

Price Sensitive Information

Price sensitive information is information or data related to a company's trading or any other affairs which is likely, if generally known, to have an influence on its share price. Use of such information prior to general release could lead to criminal charges of Insider Trading.

It shall also include the information regarding the client's orders, trades positions or any other client related detail that may appear to cast any influence over the price of the security.

Employees / Directors

Employees / Directors shall maintain the confidentiality of all Price Sensitive Information. They shall not pass on such information directly or indirectly by way of making a recommendation for the purchase / sale of securities.

Need to know

Price Sensitive Information is to be handled on a "need to know" basis, i.e. Price Sensitive Information should be disclosed only to those within the organization 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.

Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc.

Chinese Wall :

To prevent the misuse of confidential information, the organization shall adopt a "Chinese Wall" policy, which separates those areas of the organization which routinely have access to confidential information, considered "inside areas" from "public areas" which deal with sale / marketing / investment advice or other departments providing support services.

The dealing room shall be separated from the back office and other departments.

The employees in the 'inside areas' shall not communicate any Price Sensitive Information to anyone in 'public areas'.

The employees in the 'inside areas' shall be physically segregated from employees in 'public areas'.

Demarcation of the various departments as inside area may be implemented by the organization.

In exceptional circumstances, employees from the 'public areas' may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

There shall be adequate Access Controls both Physical and logical to prevent the exchange of information from the "inside area" to the "public areas" without any valid reason or cause.

The persons in the "inside area" who may be required to possess or come across any information which may be treated as price sensitive shall not communicate it to any other person except for those who require the same to discharge their functions in the organisation. The persons in the "inside area" shall not be allowed to avail the facilities of communications that may be restricted by the Company or its management from time to time. These

facilities may include Mobile Phones, Internet, Emails or other modes of communication.

For K. M. Global Financial Services Pvt. Ltd.

Director