

NAMAH CAPITAL RESOURCES LIMITED

Corporate Office – 207, Linkway Estate, 2nd Floor, Malad Link Road, Malad (W), Mumbai 400064.
Tel. 022-40990400 , Fax No – 409904001. Email Id – namahcaps@yahoo.com

“Code of conduct of Prevention of Insider Trading”

1. No person shall directly or indirectly use or employ in connection with the issue of purchase or sale of any security listed or proposed to be listed in the recognized Stock Exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of SEBI or rules made there under.
2. All the persons shall maintain confidentiality of all price sensitive information & shall not pass such information directly or indirectly by way of making a recommendation for the purchase or sale of security.
3. Price sensitive information to be handled in the office on the “need to know” basis only. Any passing of the information to any another person should be with the written permission of the compliance officer.
4. Files containing confidential information shall be kept in secured files and premises & the computer files / files in electronic media shall be adequately secured by login or a password.
5. No person shall discuss, talk or communicate any price sensitive information to anyone in “public area”.
6. Any person shall not use price sensitive information for buying or selling of securities of any sort, whether for their own account or their relative accounts or Organization’s account.
7. All persons who intend to deal in Client Company shall pre-clear the transactions as per procedure, described under the Regulation of SEBI.
8. All the persons shall execute their order within one week, after the approval of pre-clearance is given. If the order is not executed within one week after the approval, the pre-clearance is required once again.
9. Such persons shall hold their investment for minimum period of 30 days in order to be considered as held for Investment purpose

10. All such persons shall required to forward the details of security transaction including the statement of dependant family members in the format & within the time limit as prescribed under the regulations.
11. Any persons who trades in securities or communicates any information or counsels any person in trading in securities in contravention of code of conduct may be panelized & action may be taken under the SEBI Regulations.
12. In case of any observation regarding violation of code of conduct, the same shall be brought to the notice of Compliance officer or SEBI.

For, NAMAHA CAPITAL RESOURCES LTD

NAMAH CAPITAL RESOURCES LTD

“Role of Compliance Officer”

The Compliance Officer is a responsible person of the organization and is required to be acting in lines with professionalism and take care as may be required under the Securities & Exchange Board of India Act, Rules and various other Regulations.

The Compliance officer role is to look after effective and proactive compliances as specified in various rules and regulations including circulars and notices issued by Securities & Exchange Board of India and Stock Exchanges.

The compliance officer will be required to work as a coordinating authority between the employees and the organization and will be the central person for taking any permission with respect to any dealing in client shares or any dealing of the employees.

In case of any deviation, Compliance officer keep the Board of Directors or such other persons authorized by Board of Directors informed about the same.

Format for Intimating Exchange regarding appointment of Compliance Officer:

ANNEXURE – I

ON THE LETTERHEAD OF THE TRADING MEMBER

To
Membership Department
National Stock Exchange of India Ltd.
'Exchange Plaza'
Bandra Kurla Complex,
Bandra (East)
Mumbai – 400 051.

Date:

Dear Sir,

This is to inform you that I/we* have appointed ----- (Name and designation of the compliance officer) as a Compliance Officer in terms of Regulation 18A of the SEBI (Stock-brokers and Sub-brokers) Regulations, 1992.

The appointment of ----- (Name of compliance officer) has been made as a compliance officer in place of ----- (Name of previous compliance officer) who has now ceased to be our compliance officer.

Additional information as required by you is provided as follows:

Name of the compliance officer	Fathers Name	Residential address & telephone nos	Qualification	Previous employment (name of organization)

I/We* undertake to intimate and update the Exchange as and when there is any change in the aforesaid information being submitted to the Exchange.

Yours faithfully,
For ----- (Name of the trading member)

Countersigned by me

Signature of Director/Partner

Signature of the Compliance Officer

* *Strike off whichever is not applicable*

This para is applicable only in case of change in compliance officer.