

## **ANNEXURE**

### **JAYANT AMERCHAND KALIDAS** **IDENTIFICATION OF INSIDER TRADING**

Based on the data provided in KYC, and from time to time interaction with clients, we should make sure that clients do not indulge in insider trading.

Insider is any person who is or was connected with the company, and who is reasonably expected to have access to unpublished price sensitive information about the stock of that particular company, or who has access to such unpublished price sensitive information.

Information that could be price sensitive indulges periodical financial results of a company, intended declaration of dividend, issue of buyback of securities, any major expansion plans or execution of new projects, amalgamation, major takeovers, etc..

Dealers are advised to keep the above factor's in mind while punching trades on Bolt terminal and draw management's attention if any client trades based on insider information as per interaction with clients on the phone.

For  
JAYANT AMERCHAND KALIDAS

JANAK DALAL  
PROPRIETOR