

FARSIGHT SECURITIES LTD.

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| Policy created by | HR Manager and Compliance Officer |
| Policy reviewed by : Compliance Head | Policy reviewed on : 04.08.2023 |
| Approval authority | Chairman – Dr. Naresh Maheshwari |
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Code of conduct-Prevention of circulation of unauthorized information by staff

Hiring of Employees

The company will have adequate screening procedures in place to ensure high standards when hiring employees. They should identify the key positions within their own organization structures having regard to the risk of money laundering and terrorist financing and the size of their business and ensure the employees taking up such key positions are suitable and competent to perform their duties.

Employees' Training

Company must have an ongoing employee training programme so that the members of the staff are adequately trained in AML and CFT procedures. Training requirements should have specific focuses for frontline staff, back office staff, compliance staff, risk management staff and staff dealing with new customers. It is crucial that all those concerned fully understand the rationale behind these guidelines, obligations and requirements, implement them consistently and are sensitive to the risks of their systems being misused by unscrupulous elements.

Investors Education

Implementation of AML/CFT measures requires The back office and DP staff to demand certain information from investors which may be of personal nature or which has hitherto never been called for. Such information can include documents evidencing source of funds/income tax returns/bank records etc. This can sometimes lead to raising of questions by the customer with regard to the motive and purpose of collecting such

information. There is, therefore, a need for the back office and DP staff to sensitize their customers about these requirements as the ones emanating from AML and CFT framework. The back office and DP staff should prepare specific literature/ pamphlets etc. so as to educate the customer of the objectives of the AML/CFT programme.

Acceptable Practices and Process:

No employee shall circulate any market related information/ news/ market buzz/rumour or unverified information (information which is not authentic as defined above), at any time without verification, to clients or any other person through phone, SMS, email (personal or official), blog or any other mode of communication. Opinions/views etc. expressed by employees would not be considered as unauthenticated news provided the opinion has a demonstrable and rational basis and be clearly stated as the opinion of the author. Hence, any market news that can be circulated should either be authentic as defined above or should be the opinion of the employee. In case of any need for clarification whether any particular news is authentic or not for further dissemination, the employees must seek approval of their supervisor/head of department followed by an approval from Compliance Officer on email along with the backups available on the news. E-mail seeking approval in this regard needs to be sent to the Compliance Officer, at cs@centrum.co.in. If any market related news, whether authentic or unauthentic which is received by employees in their personal/ official mail or blog or any other manner, same can be forwarded in writing (mail/blog etc.) to anyone, only after approval of their supervisor/head of department followed by an approval from the Compliance Officer.

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