

MAASHITLA SECURITIES PRIVATE LIMITED

Code of Conduct and Ethics

Registered Office: 451, Krishna Apra Business Square
Netaji Subhash Place,
Pitampura, New Delhi-110034
Tel: 011-45121795

Compliance Officer: Mukul Agrawal
E-Mail Id: ig@maashitla.com

Principal Officer: Sunil Kumar Agrawal
E-Mail Id: sunil@maashitla.com

A. Introduction

Maashitla Securities Private Limited ('**Maashitla**') expects that all its employees shall observe and exhibit high degree of ethics, fairness & transparency in conducting themselves in discharge of their duties and responsibilities in line with the Company's Code of Conduct and Ethics. Maashitla must always act with integrity to ensure we are relied upon by our clients. It is always expected that the employees of the company acts with a high degree of integrity to ensure that trust is maintained by the clients.

The Code of Conduct and Ethics ('**Code**') outlines the requirement that every single person working with and for the Company, must comply with.

B. Responsibility:

It shall be the responsibility of the Compliance officer to ensure familiarity and strict implementation of the Code and any incident of non-compliance shall be taken action against.

C. Confidential & Proprietary Information and Data Protection

- i. Confidential & Proprietary Information includes without limitation, any information in the possession of the Company designated as such viz., all documents, computer programs, software products, designs, patents, trademarks, inventions and any other copyright material produced by the Company and information in whatever form regarding the Company's business plans, methods, financial data, personnel, suppliers, customers and partners.
- ii. The employee must not without appropriate authority, disclose to any third party and/or use for his/her own benefit any confidential & proprietary information. The employees may share the information only on 'need to have' and 'need to know' basis. The employee must not without due permission possess and/or make copies of such confidential & proprietary information.
- iii. The employee must adhere strictly to the specific security measures and internal controls that have been established by the Company for protection of information / data and safeguarding the integrity and validity of computer systems in the manner prescribed by Information Security Policy.

D. Records Management

Employees need to be aware of their record keeping responsibilities and they should adhere to proper records management practices and procedures. Employees must not damage, dispose of, or in any other manner, interfere with official documents.

E. Policy on Countering Bribery

No employee shall involve in offering or receiving any bribe or its equivalent in any form. It shall be the responsibility of every employee to bring any such incident to the notice of the compliance officer.

F. Dealing with Clients

An employee who receives any complaint from any Investor, Client or Government bodies shall acknowledge the receipt within 5 (five) working days and shall resolve the complaint within 15 working days. If the redressal of the complaint requires more time, the same shall be communicated to the complainant duly acknowledging the receipt of the complaint within 5 (five) working days. All replies being sent to the Investor, Client and Government bodies shall be duly approved and/or authorised by the Compliance Officer

G. Dealing with Regulatory Authorities

Interaction with any Authorities like SEBI, Stock Exchanges and Depositories shall be done only by the Compliance Officer or Director.

H. Ill/ Mis-Treatment

In an event where any employee is aggrieved due to any mis-treatment given to him/her in the Company, he/she may approach the Compliance officer in writing through any e-mail addressed to mukul@maashitla.com. Such Mis-Treatment shall include ill treatment, bias or favouritism by any employee.

I. Reporting by Employees

Any employee of the Company may report an unethical practice or malpractice of any other employee directly to the compliance officer without any fear.

J. Alcohol and Smoking

Any consumption of Alcohol or Smoking is strictly prohibited within the premises of the Company.

K. Attendance & Punctuality

The Company expects all its employees to be punctual and not takes leaves until it is necessary. Any prior leaves shall be approved by the responsible team.

An employee who is absent without taking due approval for a continuous period of four (4) days would lead to another absent day.