

PROGRESSIVE SHARE BROKERS PVT. LTD.

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CODE OF CONDUCT

This policy explains proper internal code of conduct and controls for the staff of Progressive Share Brokers Private Limited. It is applicable to all employees and anyone representing on behalf of the company.

The adoption of this Code of Conduct is achieving the ethical standards in the conduct of business. It is to articulate high standards of honesty, integrity, ethical and law abiding behavior expected of all employees.

Employees of the Company are obliged to promptly furnish any market related information received by them from an unverified source /communication channels to the Compliance Officer or reporting person of the Company.

The Company has restricted the access of private e-mails, chat forums/messengers, blogs, social networking websites etc. in office, unless otherwise permitted to specific individuals by the management. Such individuals irrevocably undertake that access to such sites will not be misused to the extent of facilitating unauthenticated news in any manner. The use of the official e-mail id for posting unauthenticated news in mail groups, forums, blogs etc. will attract disciplinary action.

Further strict action would also be initiated against any employee representing the company in any manner whatsoever, who facilitates posting unauthenticated news.

Any employee of the Company who fails to observe the provisions of this policy shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for penal action.

Nothing contained in this clause shall prevent the Company/ Management/ Compliance Officer to take appropriate action against such employee for breach of duty. The management of the company shall take all prudent steps to identify and restrict any act that may lead to violation of this policy.