



**DIMENSION FINANCIAL SOLUTIONS PRIVATE LIMITED**

**12.3 Employees' Investment Policy**

**Dimension Financial Solutions Private Limited** ('Our Company'), has an Employees' Investment Policy to ensure that all investments made by employees align with regulatory standards, maintain the highest level of integrity, and avoid any actual or perceived conflicts of interest. This policy applies to all employees, including key managerial personnel, and extends to their immediate relatives for investments made jointly or individually.

- Employees may undertake personal investment activities including security transactions provided that these actions comply with applicable regulations and such decisions are based on publicly available information.
- This policy does not cover investments transactions such as bank deposits, mutual funds and any other specified financial instruments declared by our company from time to time.
- The employees are prohibited to engage in transaction of securities of clients for whom we are working without prior permission of compliance officer.
- Employees must refrain from participating in personal transactions that conflict with our company's and its client interest such as using material non-public information or insider knowledge to buy or sell securities.
- "Material non-public information," also known as "inside information," refers to confidential data about a company that has not been disclosed to the investing public. This information has the potential to significantly impact the market value of the company's securities if it were to become known.
- Transactions shall be monitored by the compliance officer, and any attempt to engage in insider trading or other prohibited practices shall result in strict disciplinary action. Employees must refrain from entering into transactions that create actual or potential conflicts of interest with the organization's operations or its clients.
- From time to time to maintain transparency and safeguard against conflicts, our Company shall announce a list of restricted securities in which employees are not permitted to trade. Additional restrictions may include a prohibition on opposite transactions, such as buying and selling the same security within six months.

For Dimension Financial Solutions Pvt. Ltd.

Director



- Our Company policy underscore the responsibility of employees to maintain high ethical standards and fair treatment of all stakeholders. Employees shall not engage in activities that manipulate market demand or supply or influence securities prices. They are also prohibited from sharing sensitive information that could benefit others financially. Our Company shall implement information barriers to ensure that sensitive information is not inadvertently shared across departments.
- The designated Compliance Officer shall oversee the implementation of this policy, conduct periodic audits, and ensure compliance with regulatory requirements. Violations of the policy shall be met with strict consequences.
- As part of our proposed merchant banking activities, the Company shall ensure that all employee investments are in line with our commitment to ethical practices, market integrity, and the trust of our clients and stakeholders. Regular training and updates shall be provided to employees to enhance awareness and adherence to the policy, reinforcing a culture of compliance and transparency within the organization.
- It is imperative that we uphold the clients' trust by taking every possible measure to protect their privacy and sensitive information. Whether in public or private settings, discussions about our clients' affairs should be strictly limited to those individuals within our organization who have a legitimate need to know.
- Our Company employees will not use their position to obtain favoured treatment to buy or sell securities for their own or family accounts.
- The employees are required to acknowledge that they have read the policy and are aware of policy's contents on an annual basis, employees must certify that they have adhered to the policy's requirements throughout the year This certification includes confirming that they have obtained pre-clearance wherever required for securities transactions and have disclosed or reported such transactions as mandated by this policy.

For Dimension Financial Solutions Pvt. Ltd.

*Ranika Sharma*

Director

