User Manual

Prohibition of Insider Trading Compliance Solution

For

BIRLA CABLE LIMITED

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Confidentiality

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01. Login

Welcome to proCS Insider Trading Solution. We will start from logging in to proCS Insider Trading Compliance system & systematically guide you through the app. First On your PC or Laptop, please open the below link using any latest web browser – Internet Explorer/ Chrome / Firefox/ Safari.

Please use the link – http://115.243.50.108:81/Login.aspx

The Page displayed will consist of two options –

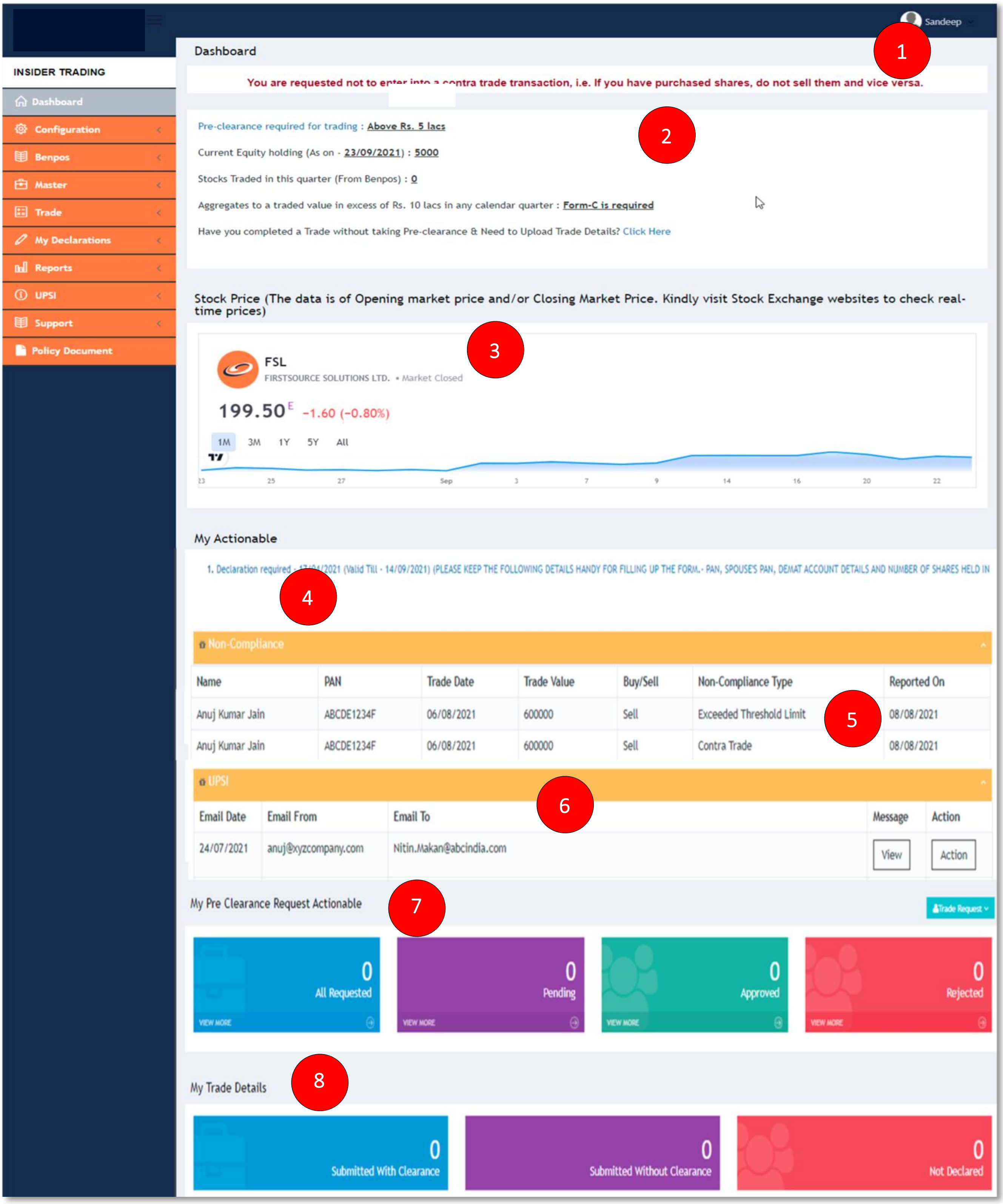
User Name: Your Official Email Id or Login ID As shared in Welcome Email
Password - Shared over welcome email

- **Forgot Password** – "Enter your registered email id to retrieve your current password on your email"

02.

My Dashboard

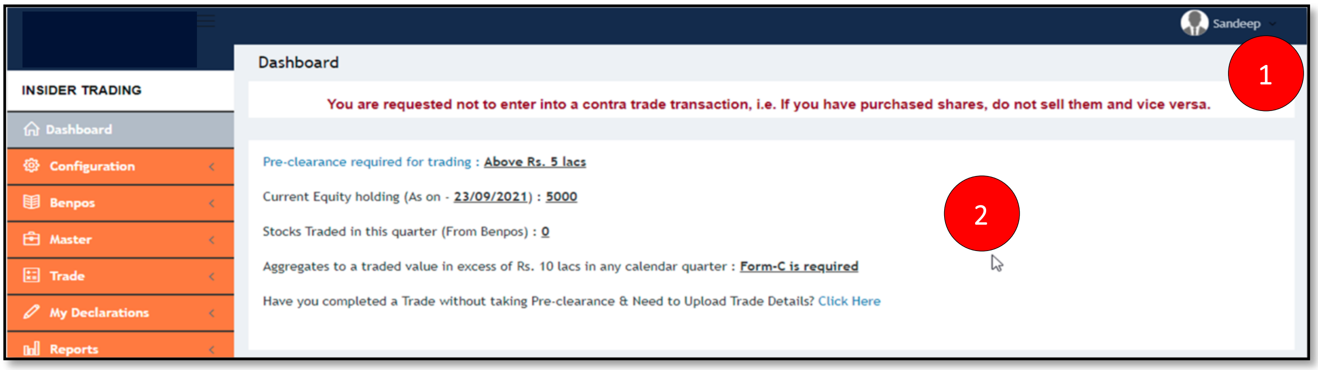
Upon Login, the users are guided to their Insider Trading Dashboard as shown below-



The Details of the Dashboard Modules are listed on next page-

02.1 Trading Window Closure

Trading Window Closure Alerts or other custom alerts are provided **as RSS feed on the Top of the Dashboard**. When the Users log into the app, if the Trading Window is closed, the alert is displayed. Also, such *alerts are shared with users regularly on their email ids during the window closure period.*



02.2 PIT Compliance - Important Details

Specific and important details regarding the organizational PIT compliances are provided in this section as shown in screenshot above. These are guiding rules for the user to trade and seek pre-clearance approvals. Details are provided as-

a. **Pre-Clearance Required for Trading:** The Limit of Shares/Rupees set per quarter, before Designated Persons need to seek Pre-Clearance approval from the Compliance officer.

b. **Current Equity Holding:** As per the last BENPOS Trade File or Trade by User, the Current holding of the user in the system

c. **Stocks Traded in this period using BENPOS/Broker Note:** Details of Shares Traded/Value of Shares Traded in current quarter by the User both in terms of last BENPOS uploaded or Broker Notes uploaded by user *whichever is latest.*

d. **Aggregates to a traded value in excess of 10 Lakh Rupees in any calendar quarter:** ***Form C is required* –** Is user to notify Designated Persons that any trade in excess of INR 10,00,000 would require Form C to be submitted to the Compliance Officer and duly to stock exchange.

e. **Have you completed a Trade without taking approval & need to upload BROKER Note?** Click Here: Can be used by The Designated Persons to upload Broker Note details of *Trade made without seeking Pre-Clearance from Compliance officer*. The System auto generated the Form C and Form J as per SEBI compliances when the required details are provided by user

02.3 Stock Price and My Actionable

2. Company opening and closing Stock price is listed in Stock price chart provided. For real time stock price, please visit stock exchange website.

3. **My Actionable** are tasks that are assigned to Designated Persons by the Compliance Officers for Declaration and Closure. At present, there are three types of actionable defined in the system. This are as-

a. **Declaration Required Actionable**

As per SEBI PIT Compliance Act -2015, All Designated Persons are required to provide their Personal, Relative and Holding Declaration at least once every year to the Compliance Officer is prescribed formats. This actionable is activated when such declaration is required and alerts are shared with the Designated Persons over emails. This is a Statutory Compliance and the Declaration from Users is required on or before the Due date mentioned. In order to check how the Declaration is made by Designated Persons, ***Please Click Here***

b. **Training Submission Actionable**

proCS Insider Trading System allows Designated Persons to attend have a hand on "Audio/Video" or "Documented" Training on SEBI Prohibition of Insider Trading Regulations. The Trainings can be also mandated by the Compliance Officer for all the Designated Persons.

02.4 Non-Compliance Events

If any Non-Compliances are found on behalf of user, those are reported on the Dashboard under header “Non-Compliance”. These Non-Compliance events are for information purposes and are generated when the user either uploads the Trade details or are found in BENPOS trade file when uploaded by the CO

Note: Every Non-Compliance event is sent to Compliance officer for review and approval. A Non-Compliance event is marked final after the review from CO.

Non-Compliance 4

Pan	Transaction Date	Non-Compliance Type
BCBPS3316M	17/02/2021	Folio Not Declared
BCBPS3316M	17/02/2021	Window Closure
BCBPS3316M	17/02/2021	Window Closure

Different types of Non-Compliance Events are detected by System are mentioned as follows: -

a. FOLIO Not Declared - The FOLIO/DEMAT Account Number has not been declared by the User while providing his/her declarations and same has been found consisting of some holding/shares. Designated Persons need to add/declare this FOLIO/DEMAT Account number in “**My Declarations> Edit My Declaration> DEMAT Accounts**”

b. Window Closure **–** The Designated Person has made a Trade inside Trading window closure

c. Exceeded Trade Limit **–** The Designated Person has made a Trade above the Threshold limit without taking Pre-Clearance request from Compliance Officer

d. Contra Trade **–** The Designated Person has made a contra trade

02.5 UPSI Details

As per SEBI PIT Compliance Act – **Sept 2020 Amendment**, the reporting and maintenance of UPSI details shared with connected persons by the Designated Persons on behalf of the organization, has to be reported to the Compliance Officer. ***This is now a statutory compliance.***

In case Designated Person(s) share some UPSI related matter to a connected person who is not reported or registered in the compliance app, then the application will treat this connected person email id as a non-compliance and report this on the user dashboard as shown below-


Non-Compliance

Name	PAN	Trade Date	Trade Value	Buy/Sell	Non-Compliance Type	Reported On
Anuj Kumar Jain	ABCDE1234F	06/08/2021	600000	Sell	Exceeded Threshold Limit	08/08/2021
Anuj Kumar Jain	ABCDE1234F	06/08/2021	600000	Sell	Contra Trade	08/08/2021

UPSI 5

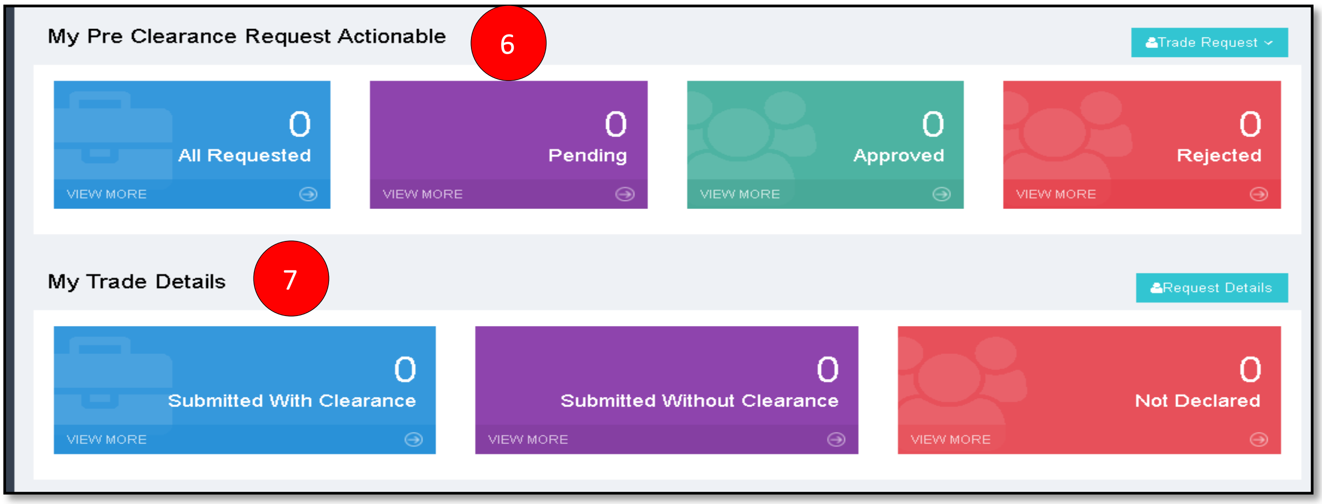
Email Date	Email From	Email To	Message	Action
24/07/2021	anuj@xyzcompany.com	Nitin.Makan@abcindia.com	View	Action

- The Email ids of the Connected Members who are not registered in the system but with whom the UPSI email was shared are reported as shown above.
- To check on how to register the Connected Members in UPSI Database, *please click here to check on how to report UPSI*

02.6

My Pre-Clearance Request Actionable

This section provides Designated Persons with complete details on the Pre-Clearance Requests made, their statuses and rejections by Compliance Officer.



1. **All Requested –** The total Number of the pre-clearance requests that you have submitted till date for approval to the Compliance Officer.
2. **Pending -** All the requests that are pending for review/approval from your Compliance Officer
3. **Approved / Rejected -** All the requests that you have submitted and are either Approved or Rejected by your Compliance officer.

02.7

My Trade Details

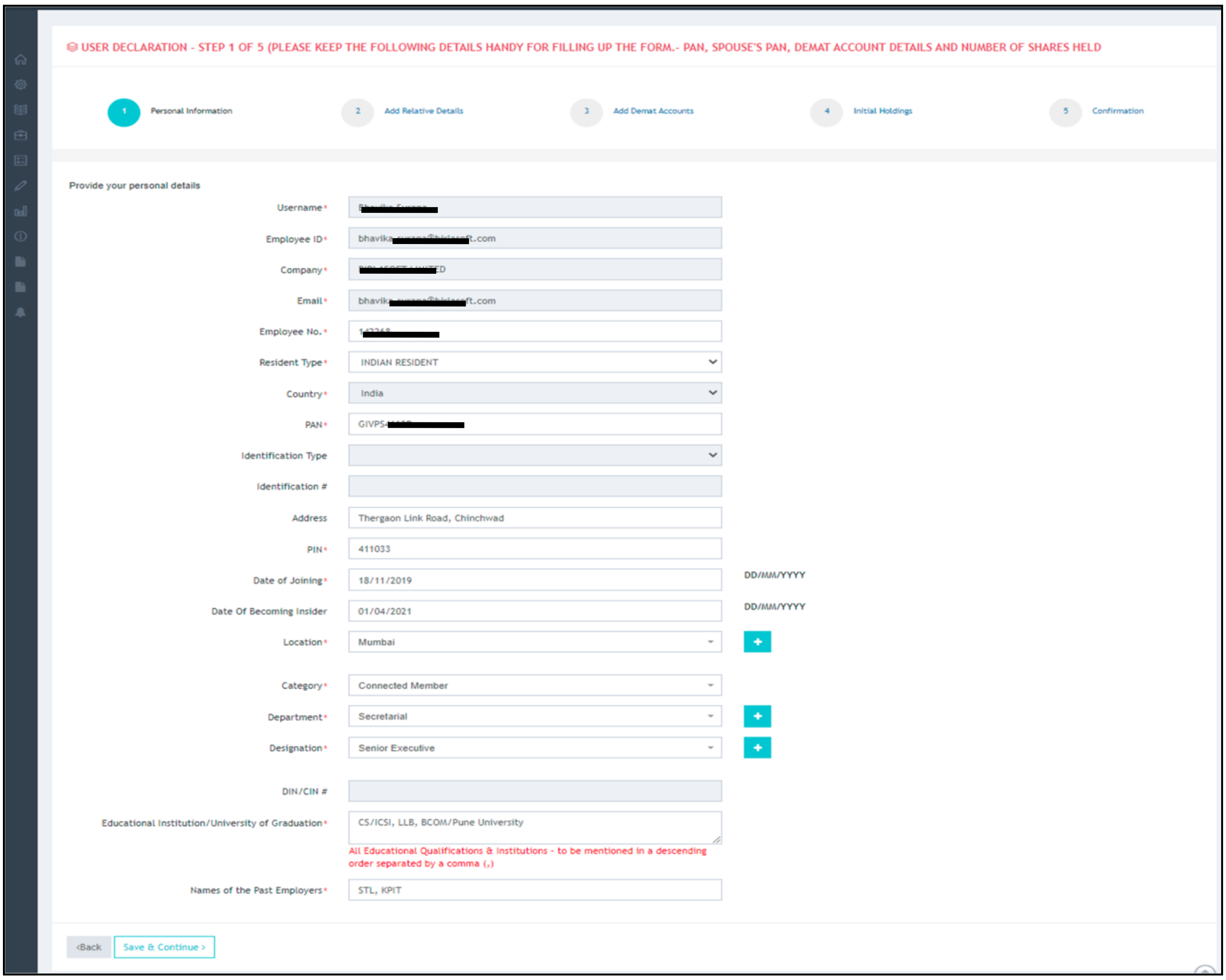
The **"My Trade Details"** section provides Designated Persons with complete details on the Trades they made along with any non-Compliances as shown in the image above. The numbers are defined as –

1. **Submitted with Clearance –** The Trades above trading limit done after seeking pre-clearance from Compliance Officer and uploading Broker Notes.
2. **Submitted without Clearance -** The Trades above trading limit done without seeking pre-clearance from Compliance Officer but the Broker Notes are uploaded before weekend.
3. **Not Declared –** All the Trades made above the Pre-Clearance Approval limit that are completed by The Designated person without seeking Pre-Clearance Approval from Compliance Officer and are not reported in the system via Broker Note upload after the transaction.

03. My Actionable - Declaration Submission

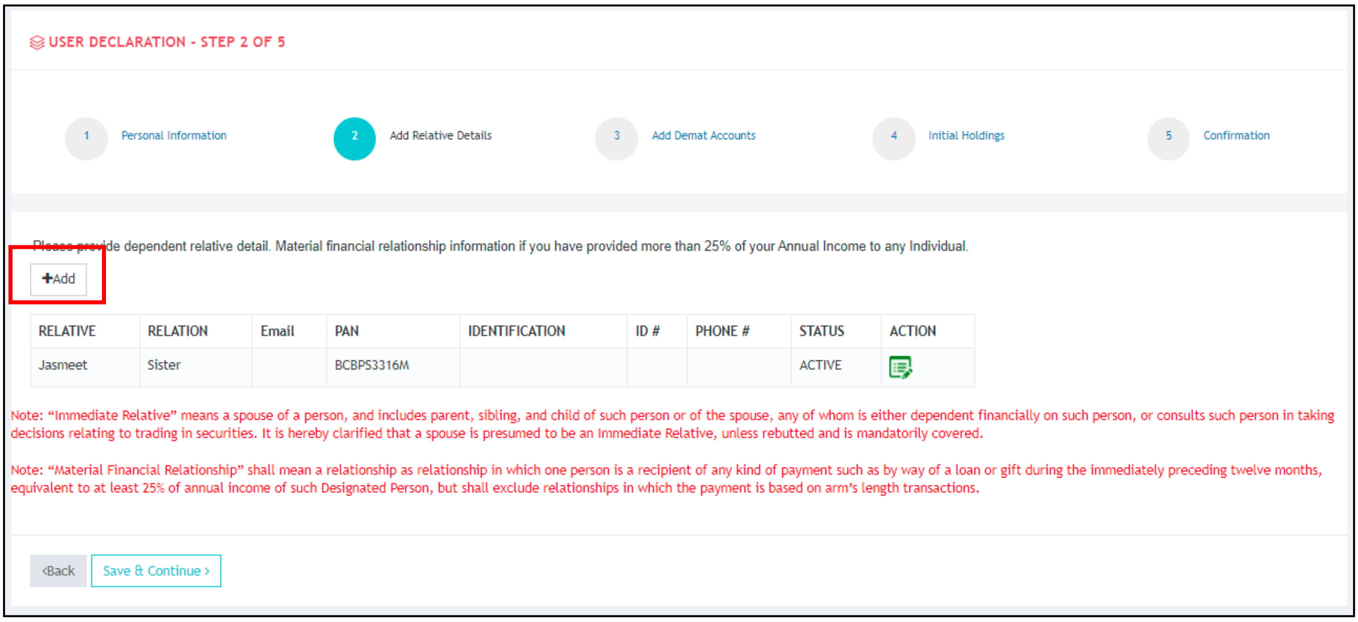
As per SEBI PIT regulations of 2015, Users are required to provide periodic declarations in the system as and when required by the organization. The system will notify the Users to submit their declaration via email alerts and a Task will be created on the Dashboard for Declaration submission for the due period.

On selecting the Declaration Task as shown in the above image, the users will be re-directed to declaration submission screen and can submit their ***Personal Details*** as provided in the steps below –

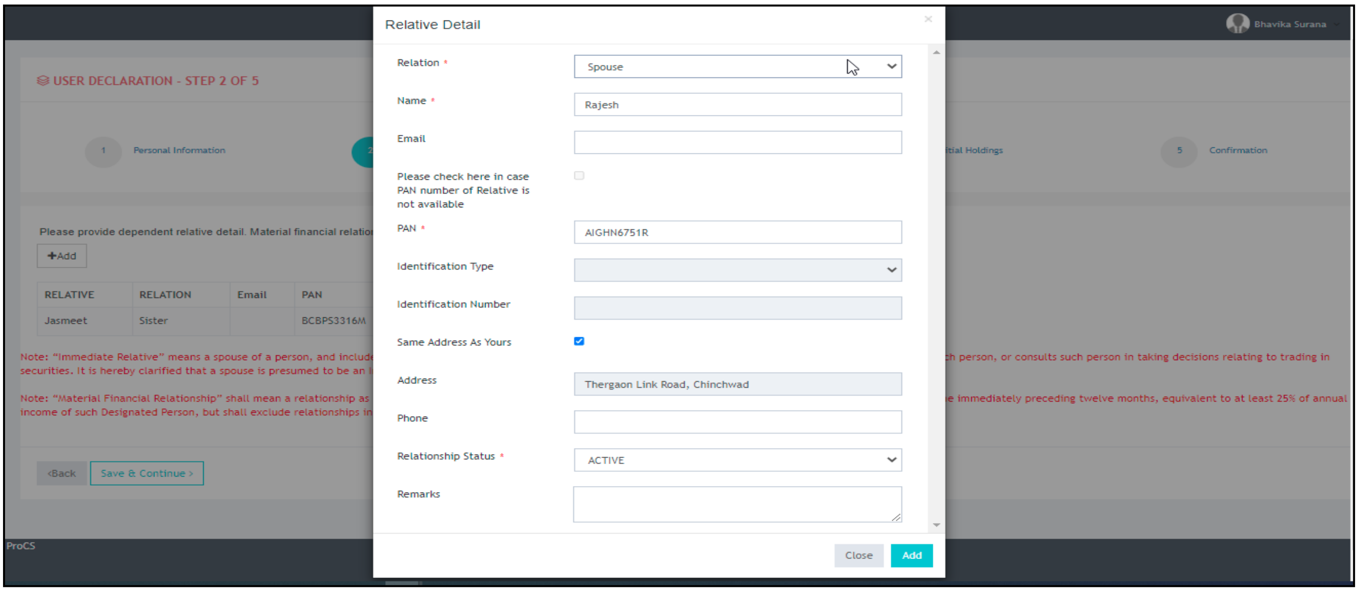


1. Mandatory Information Required from Users are highlighted with Red-Astrix (*)
2. All other fields are optional.
3. Scroll Down the page to click on [**Save & Continue >**] to move to next screen

Declaration Submission [Step 2 of 5] – Add Relative Details

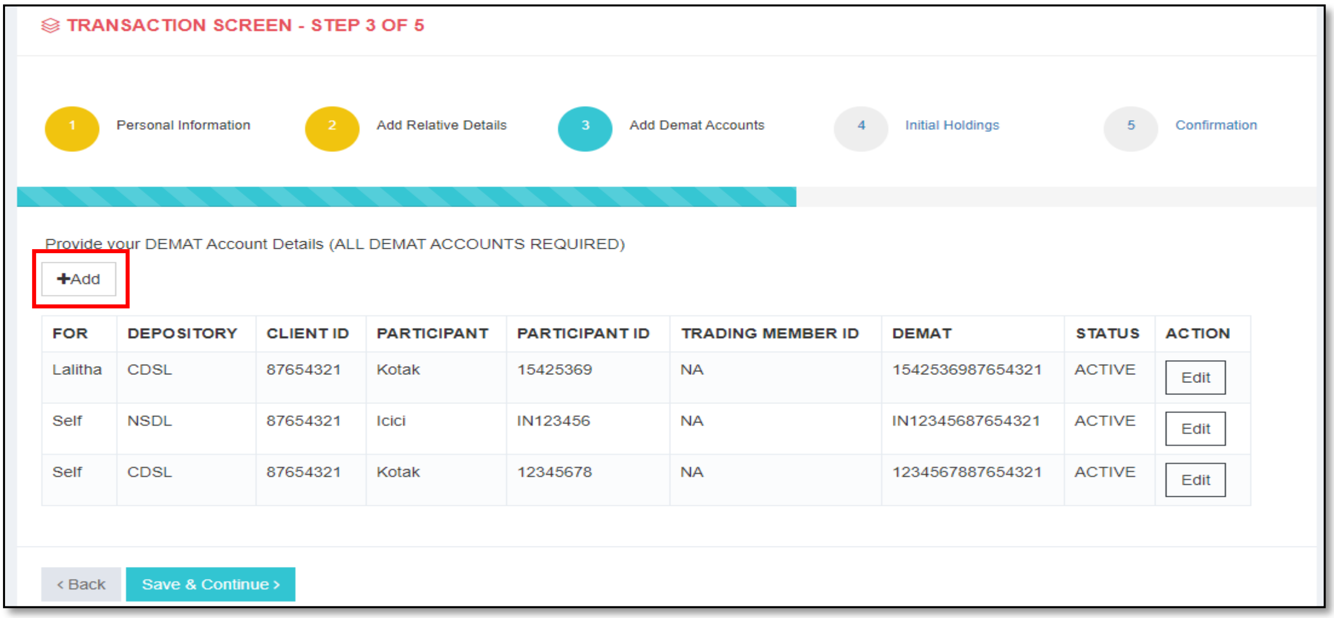


To add a new Relative, click on the **+Add button** as shown above.

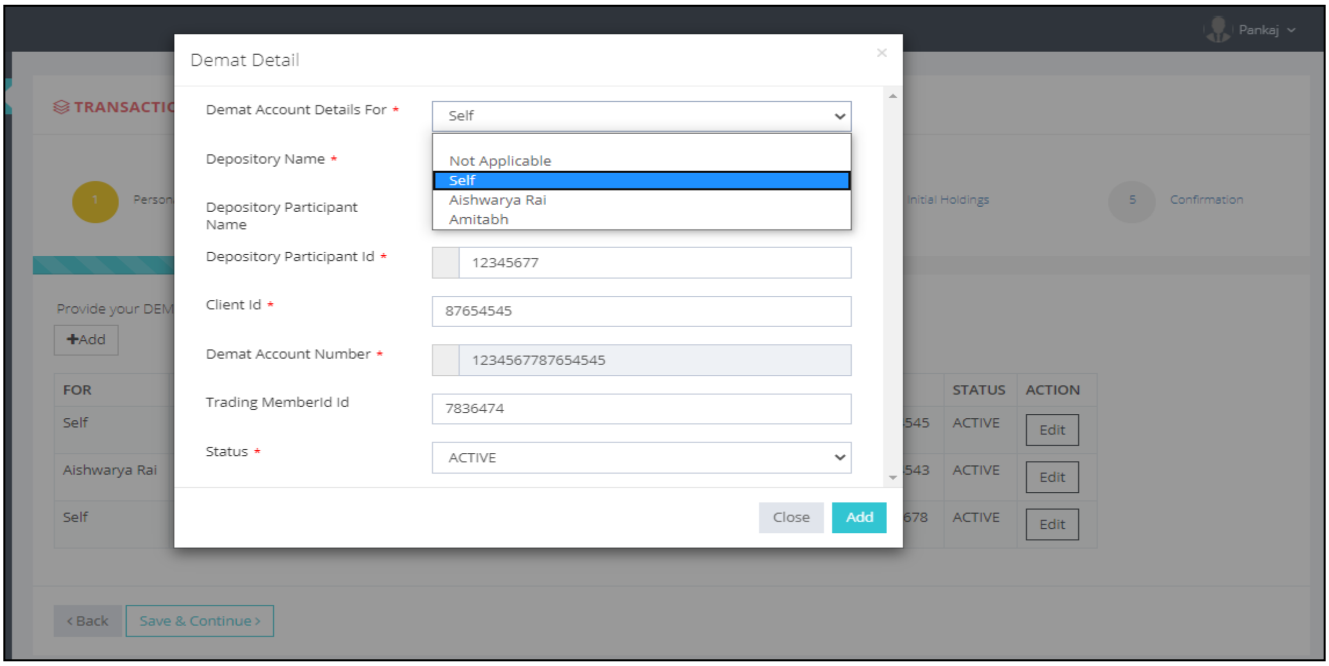


1. Mandatory Information Required from Users is highlighted with Red Mark [*]
2. In case, you have no relative to declare, select **"Not Applicable"** from the Relation Drop down
3. Once details are filled, click on Add button to save the relative details.
4. Once a Relative is added, you can also edit their information using the "Edit" option against the Relative Name.
5. You can also delete any New Relative Added till the time *your declaration is not submitted.*
6. Once all relatives have been added or their information modified, please click on **[Save and Continue]**

Declaration Submission [Step 3 of 5] – Add DEMAT Account Details

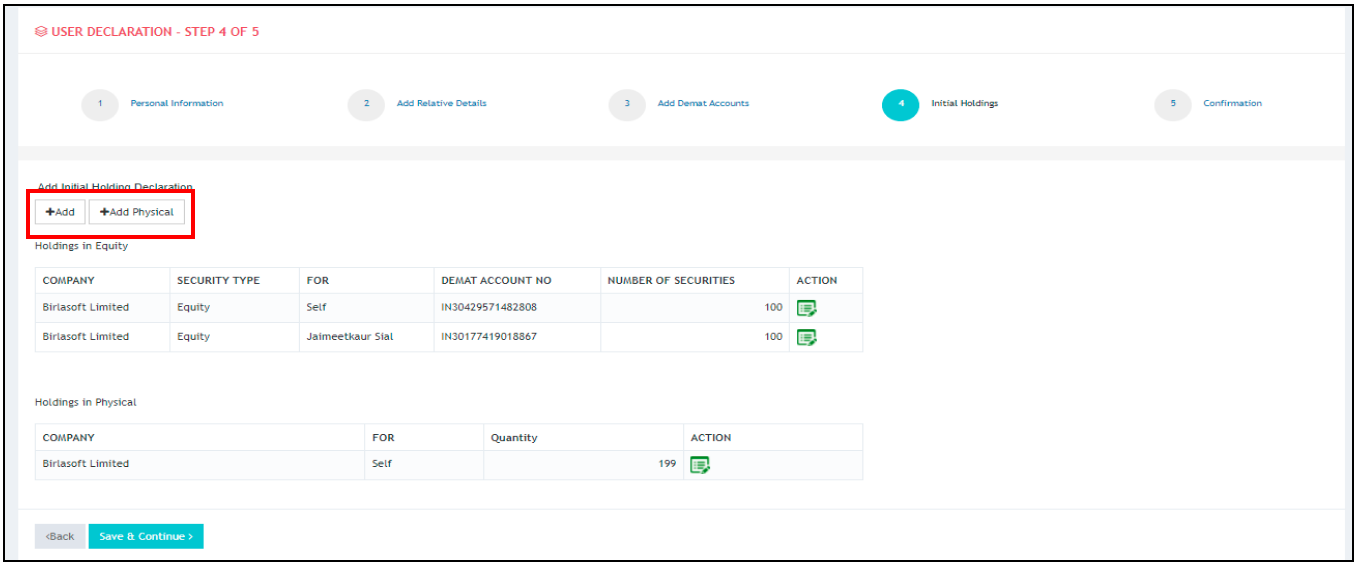


To declare DEMAT accounts for yourself and your relatives, click on **the +Add button** as shown above

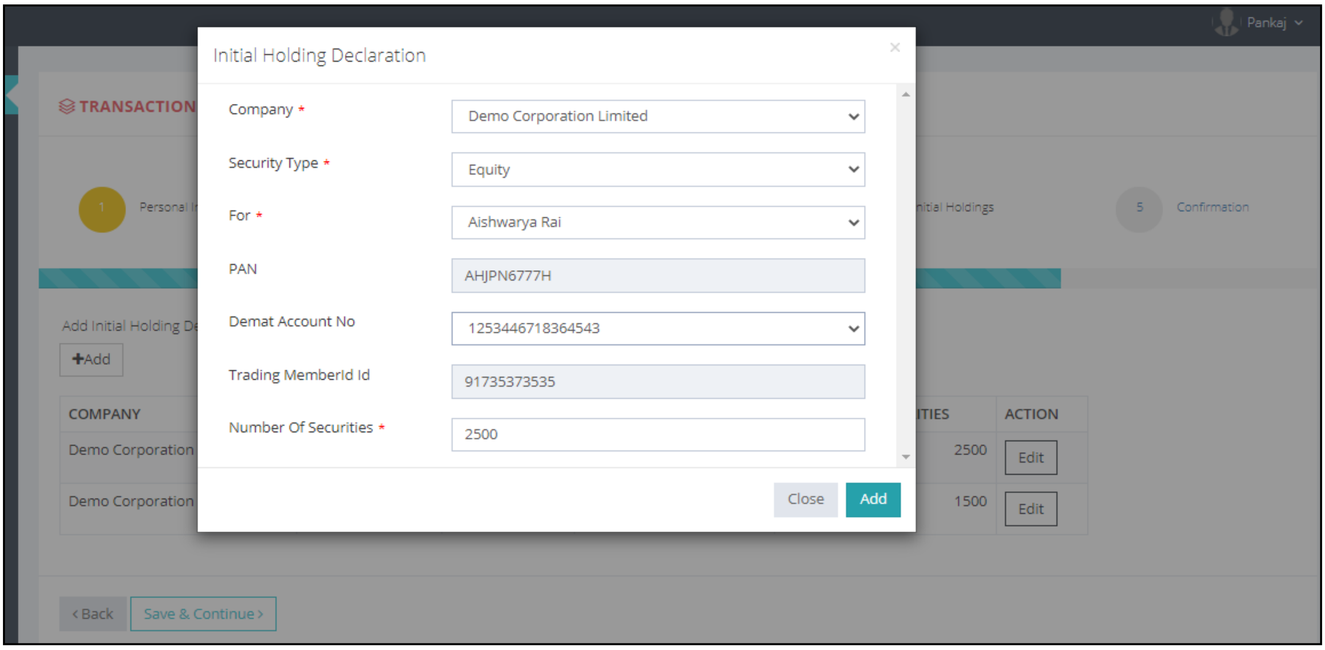


1. Mandatory Information Required from Users are highlighted with Red Mark [*]
2. In case, you have no DEMAT A/c to declare, select **"Not Applicable"** from the DEMAT A/c details for Drop down
3. Once details are filled, click on Add button to save the DEMAT account details.
4. Once a DEMAT is Added, you can also edit their information using the "Edit" option against the Account Name.
5. You can also delete any New DEMAT A/c added till the time *your declaration is not submitted*.
6. Once all DEMAT Accounts have been added or their information modified, please click on **[Save and Continue]**

Declaration Submission [Step 4 of 5] – Add Holding Details

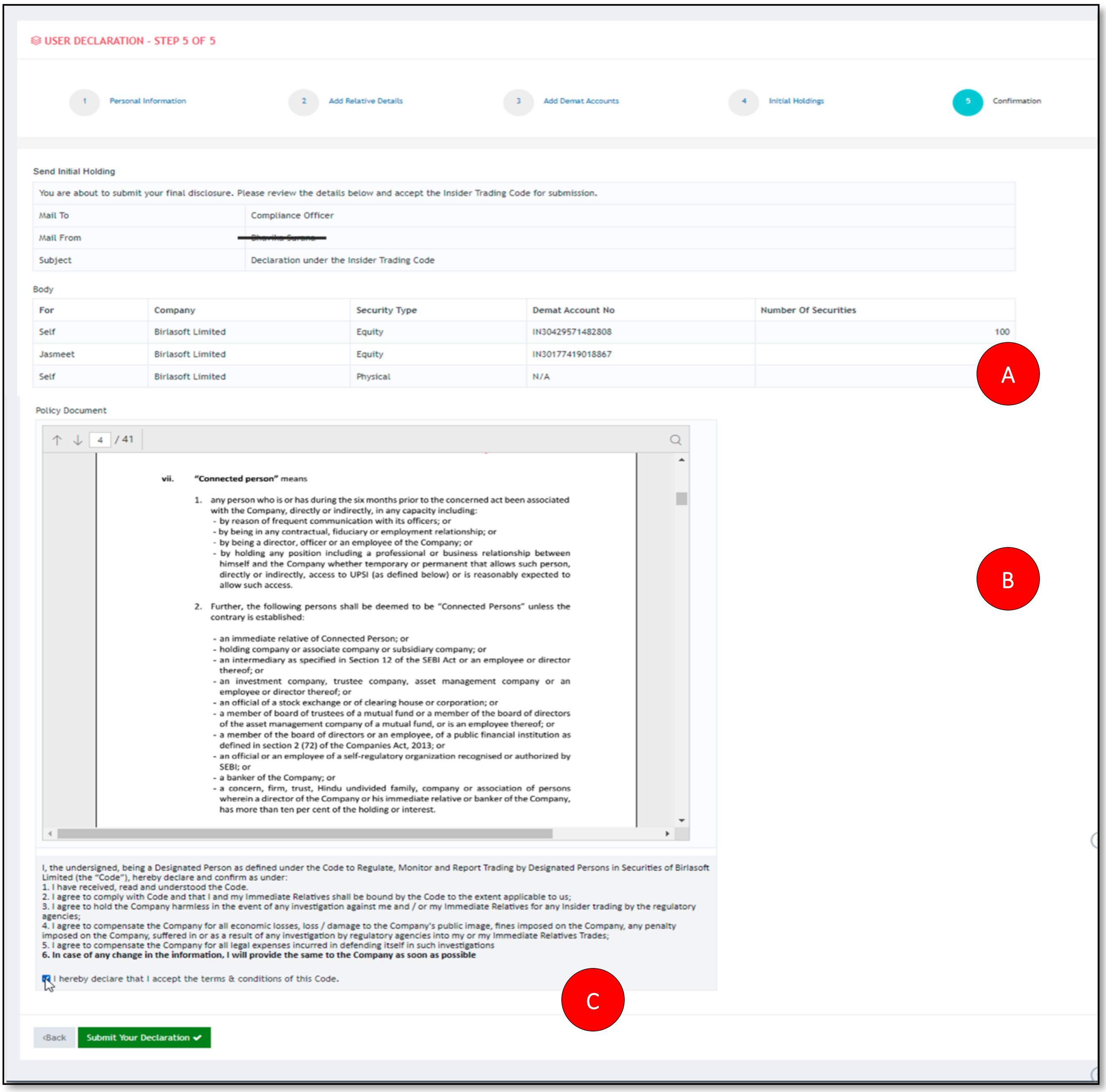


To declare Equity Holdings for yourself and your relatives, click on **the +Add button** as shown above



1. Mandatory Information Required from Users are highlighted with Red Mark [*]
2. In case, you have no Holding to declare, select **"Not Applicable"** from the Company details in Drop down
3. Once details are filled, click on Add button to save the Holding details for a particular DEMAT Account.
4. Once a DEMAT is Added, you can also edit their information using the "Edit" option against the Account Name.
5. You can also delete any New Holding added till the time *your declaration is not submitted*
6. Once all DEMAT Account Holdings have been added or their information modified, please click on **[Save and Continue]**

Declaration Submission [Step 5 of 5] – Final Submission



A. Before Final Declaration Submission, Verify the Holding details against the DEMAT Accounts provided

B. To provide a final confirmation of your declaration, it is pivotal to first read and confirm on the Insider Trading code of conduct policy as provided by your organization. Please read the PDF document before proceeding further

C. Once Policy is read, Accept the **"Terms and Conditions"** of the Document. This will enable the "Submit your Declaration" button below. In case of any query or concern regarding the policy, please connect with your Compliance Officer or Secretarial Department.

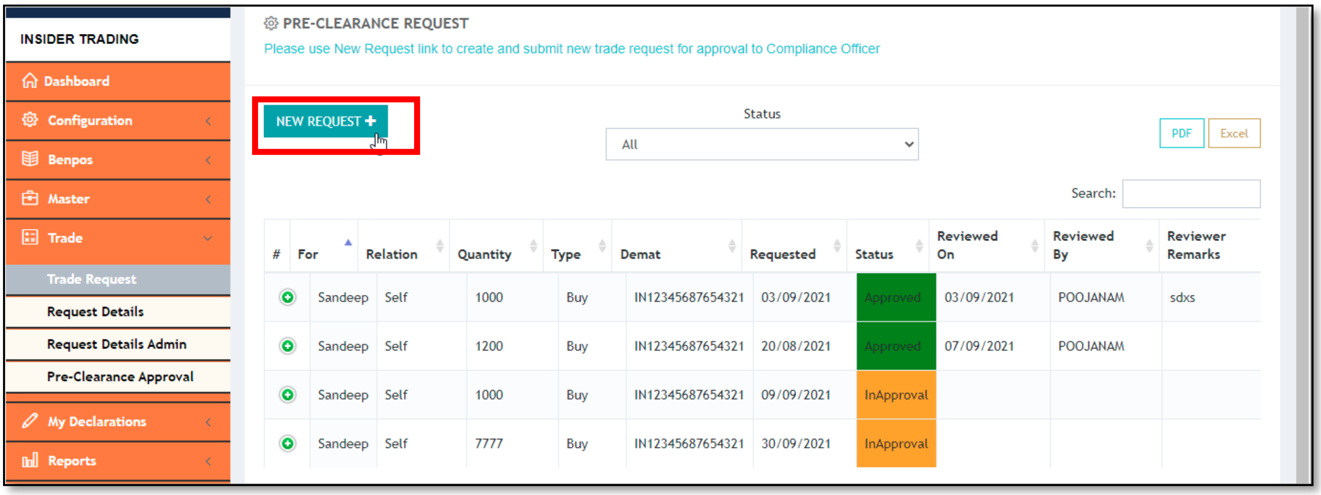
D. Proceed to Click on the "**Submit Your Declaration"** to submit your Periodic Declaration

03. Pre-Clearance Request: For Trading Approval

As per SEBI PIT regulations, Designated Persons Users are required to take Pre-Clearance for Trading above **INR 5, 00,000 or as defined by organization,** inside a financial quarter. The below steps define how you can take an approval on trading and auto generate Compliance Form C & J for submission to Compliance Officer and Stock Exchange.

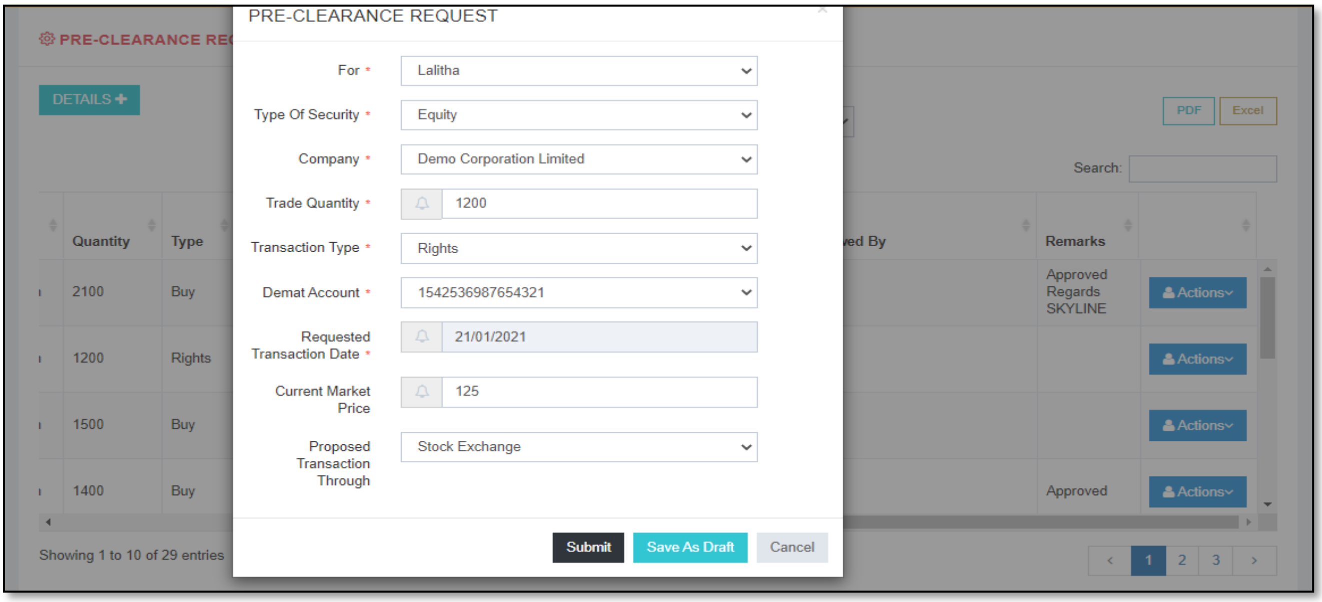
a. Request Submission

In order to take a pre-clearance request for trading, Users can create a request from the “Trade Request” Masters as shown in the image below. The Link is provided under the **‘Trade’** Menu Masters or **‘Trade Request’** icon on Dashboard.

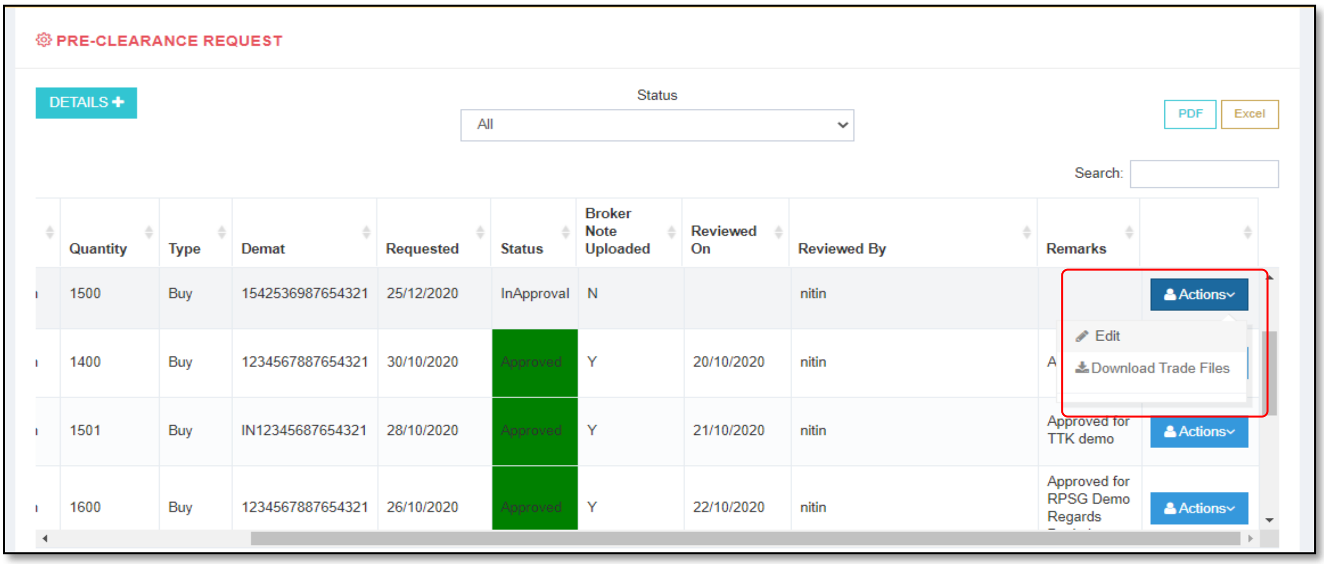


Pre-Clearance request Listing

- The pre-Clearance request details are provided by User and their relatives as shown in the image above
- To add a new Pre-Clearance request, please use the **“Details+” or “Add New”** button as shown above.
- The following Pop-up screen will appear with User required to submit the following information



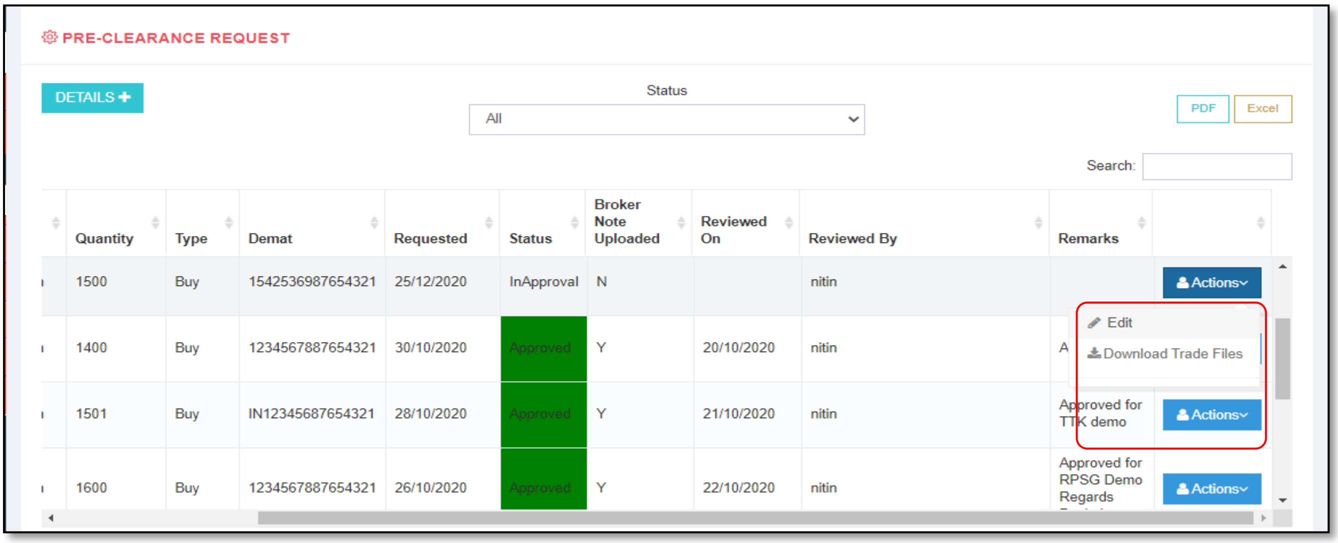
1. Mandatory Information Required from Users are highlighted with Red Mark [*]
2. Users can also use “SAVE AS DRAFT” to save the Request details to submit the request later
3. Once details are filled, click on Submit button to submit your request.
4. The request is submitted over email for approval to CO along with Request From –G & Undertaking Form-H



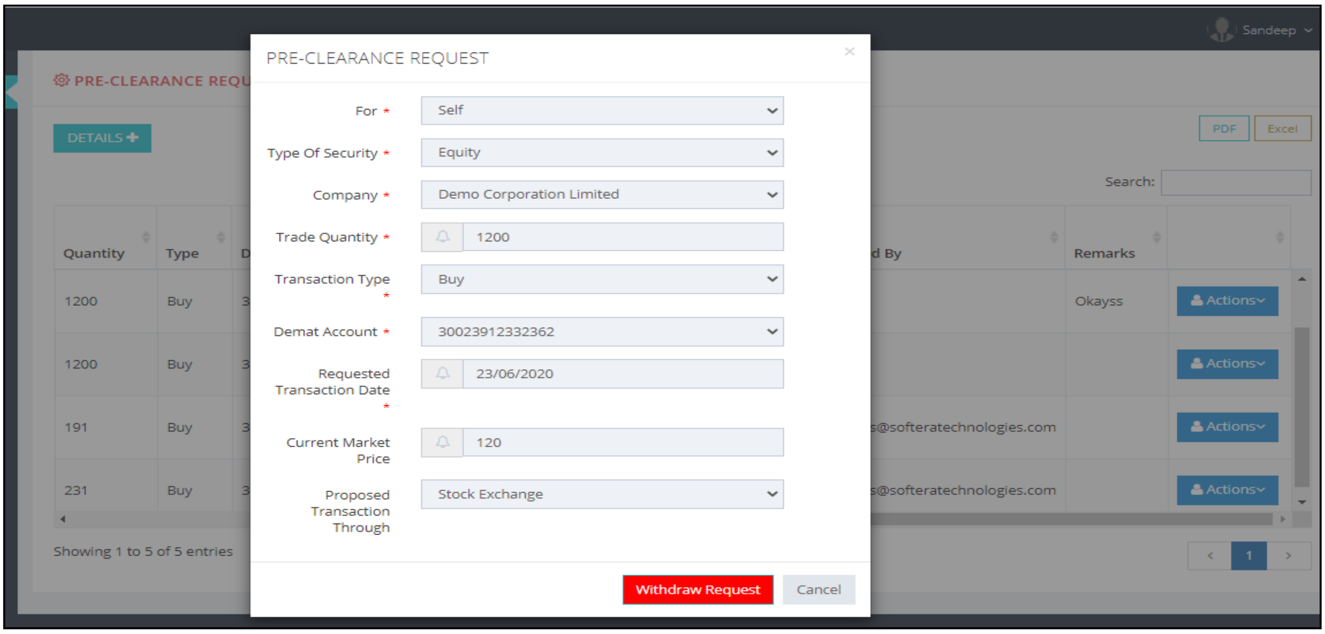
5. The request will be shown as “In Approval” until reviewed by the Compliance officer.
6. Before Approval, You can edit or withdraw the request anytime by using Edit as highlighted above
7. Users can also download related Trade Forms using the “Download Trade Files” option under Actions
8. Once your request if approved, you will auto notified on email along with Form I (Request Approval Form) and the status of your request will change from In Approval to Approved.

b. **Pre-Clearance request Edit or Withdrawal**

In order to re-submit / alter clearance request details or withdraw your request, use the Edit option against the pre- clearance request under Actions menu.



The following Pop Up appears with a Withdraw Request Button appearing.

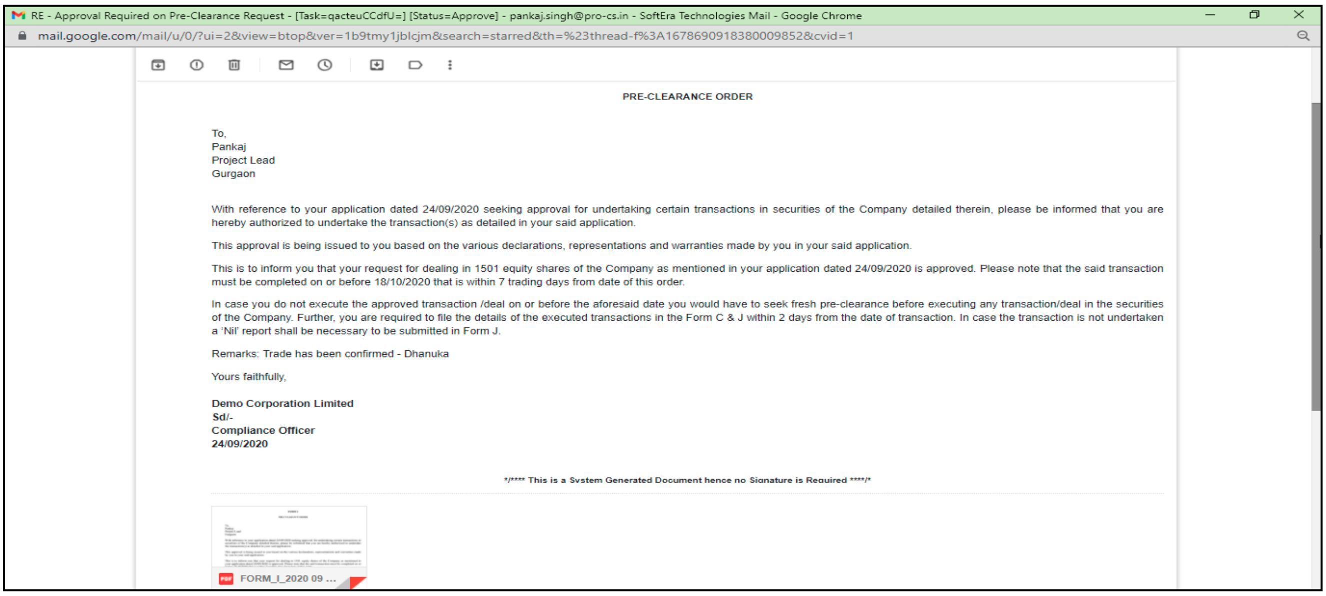


Note A

1. The requests that are In-Approval stage can only be withdrawn
2. On Request Withdrawal, Users can re-enter the details and re-submit their request for approval
3. The Requests cannot be edited once approved
4. The Status for Approved or rejected approval requests will change accordingly in the listing

Note B

The Pre-Clearance Order (After approval of request from CO) is Auto generated and shared with User via email along with a PDF of the order and Dates of trade mentioned.



RE - Approval Required on Pre-Clearance Request - [Task=qacteuCCdfU=] [Status=Approve] - pankaj.singh@pro-cs.in - SoftEra Technologies Mail - Google Chrome

mail.google.com/mail/u/0/?ui=2&view=btop&ver=1b9tmy1jblcjm&search=starred&th=%23thread-f%3A1678690918380009852&cvid=1

PRE-CLEARANCE ORDER

To,
Pankaj
Project Lead
Gurgaon

With reference to your application dated 24/09/2020 seeking approval for undertaking certain transactions in securities of the Company detailed therein, please be informed that you are hereby authorized to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This is to inform you that your request for dealing in 1501 equity shares of the Company as mentioned in your application dated 24/09/2020 is approved. Please note that the said transaction must be completed on or before 18/10/2020 that is within 7 trading days from date of this order.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the Form C & J within 2 days from the date of transaction. In case the transaction is not undertaken a 'Nil' report shall be necessary to be submitted in Form J.

Remarks: Trade has been confirmed - Dhanuka

Yours faithfully,

Demo Corporation Limited
Sd/-
Compliance Officer
24/09/2020

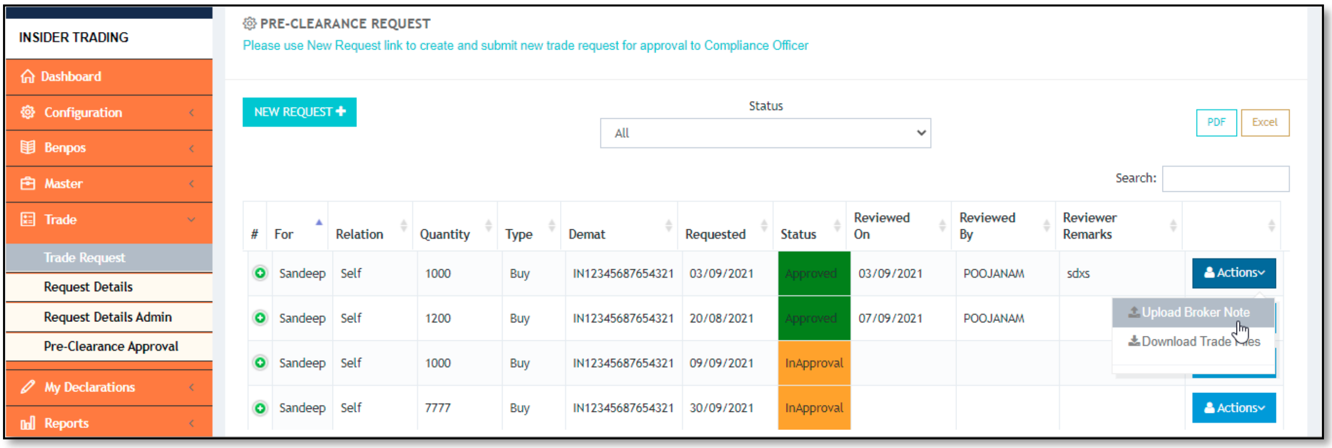
*/**** This is a System Generated Document hence no Signature is Required ****/*

FORM_I_2020 09 ...

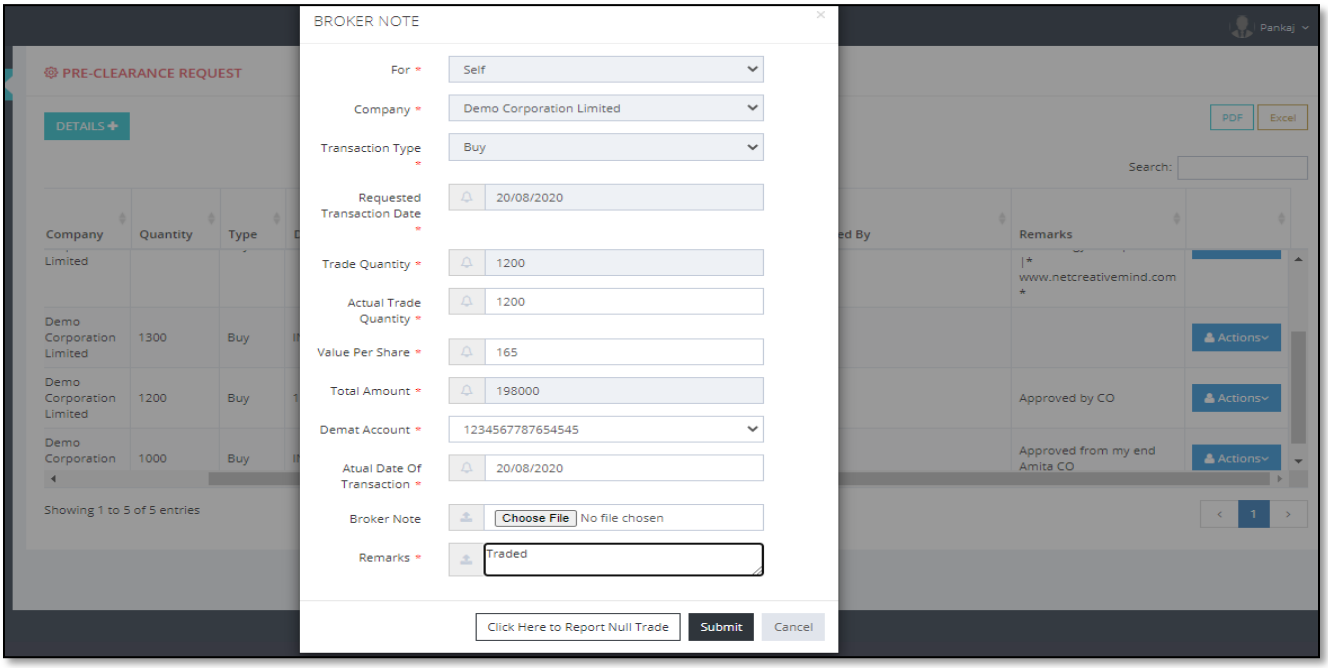
03.A

Trade Details – Upload Broker Notes

Once you have completed your Trade, you need to upload the Broker Note details along with other transaction details against the pre-clearance request that has been approved.

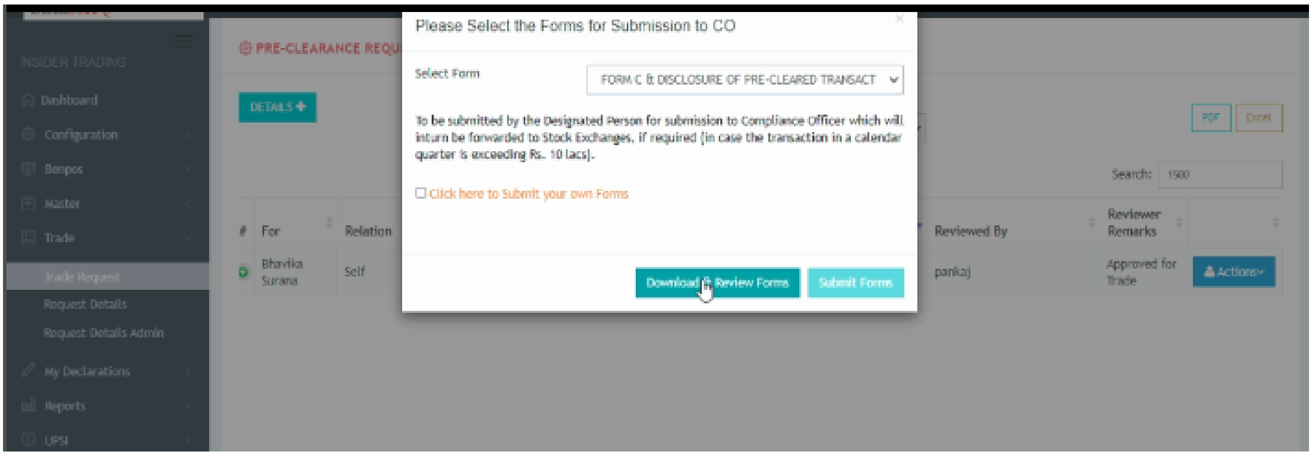


a. **Trade Details Upload** - The following Pop Up appears for **Broker Note Upload** Action.

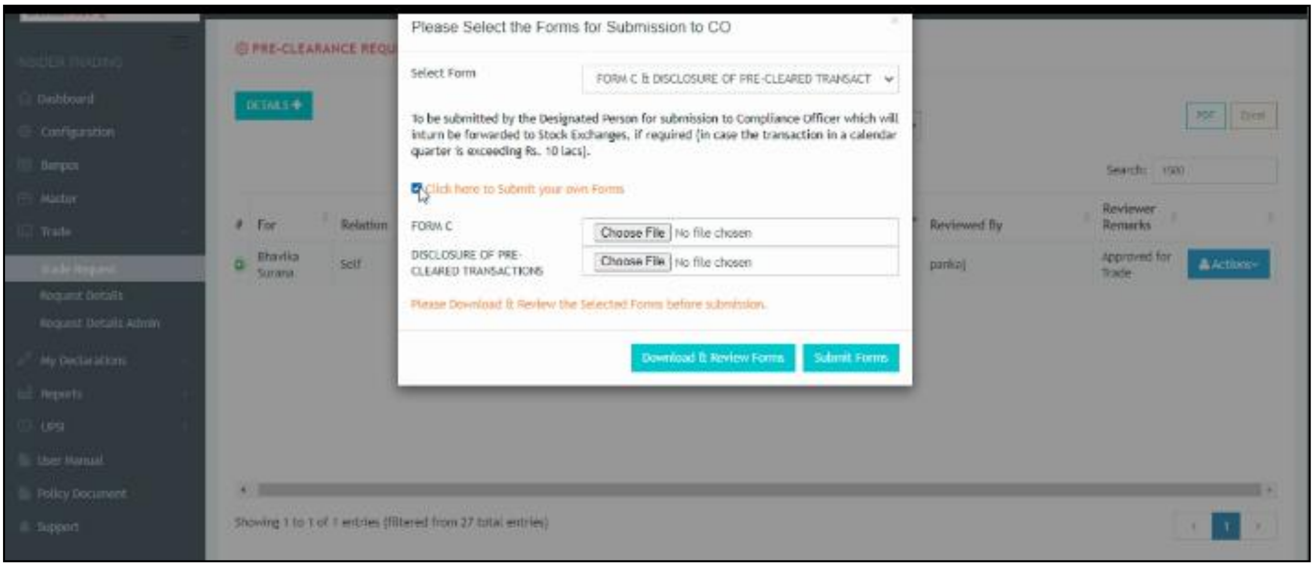


1. Mandatory Information Required from Users is highlighted with Red Astrix [*]
2. In case of a Null Trade, please select "**Click Here to Report Null Trade**"
3. In case a Trade has been made, fill in the Details, click on Submit.
4. Important Note: These actions are irreversible so please be careful into the details being submitted

Upon Submission of the Broker Note details, Form C and other Compliance Forms (if applicable) is Auto generated for your review and submission



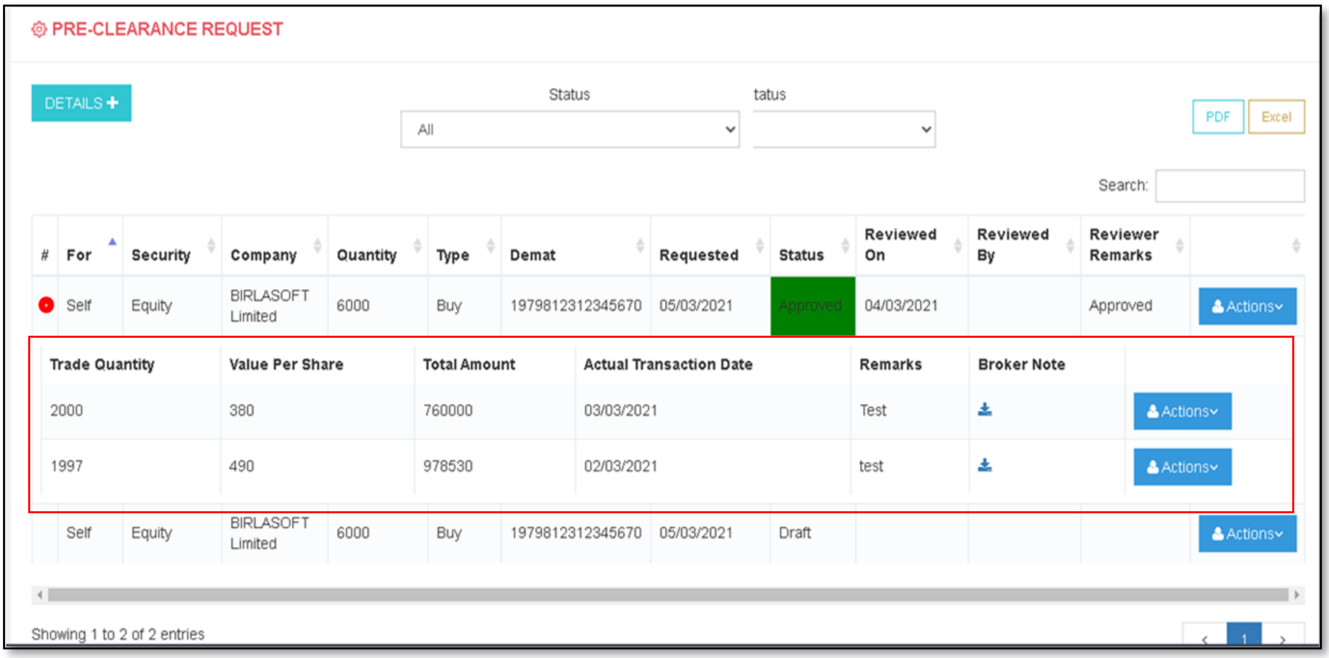
- Users can Download and Preview these forms before Final submission to Compliance officer.
- If all details are correct, just click on "Submit" and the Forms are auto submitted in PDF format to the Compliance Officer
- All the details in the From C and J Is auto generated. In case you wish to overwrite some of the Form Details, you can use **"Click here to submit your own Forms"**



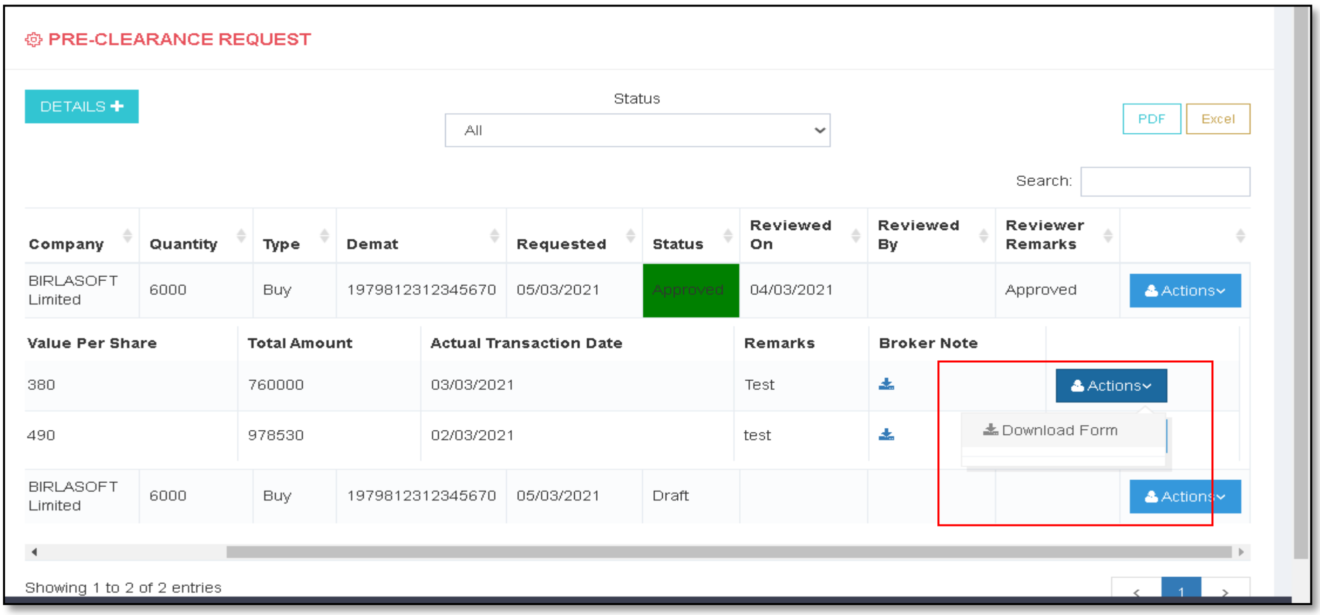
b. Multi Trade Details Note Upload

In case Users are doing Split Trades, the above procedure of uploading Broker Note Details and Submitting Forms C only needs to be repeated.

All the Broker Note Details Uploaded by the Users can be viewed by expanding the + sign against the Pre-Clearance request as shown below-



Designated Persons can also download the Forms C/D are generated by navigating to "Actions" against the Broker Note Details Submitted and selecting "**Download Trade Files or Download Form**" as shown below-



04.

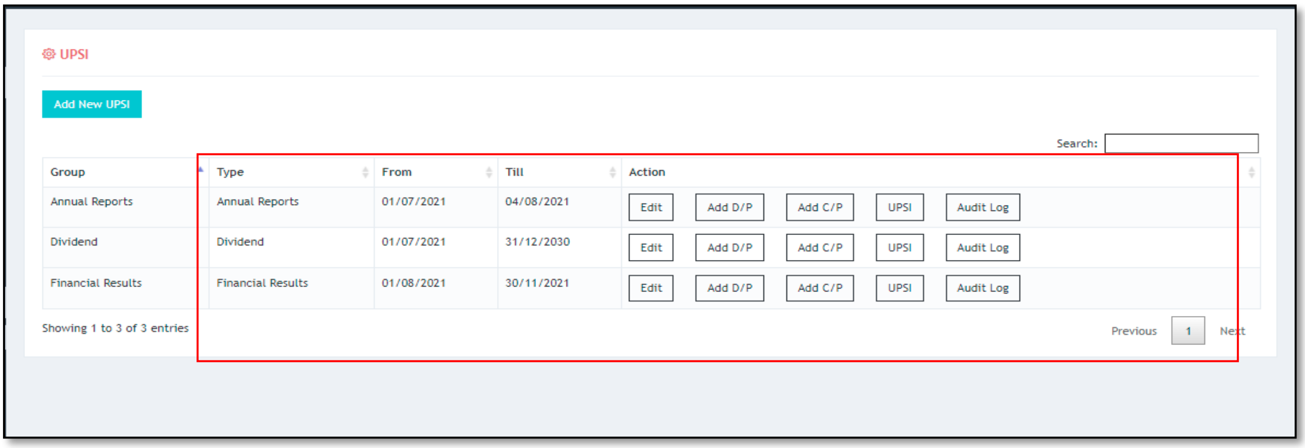
UPSI Digital Database and Group Info

As per SEBI PIT regulations of 2019, Companies are mandated to keep a database of UPSI employees along with provisioning of UPSI groups regarding the sensitive information.

The UPSI Module activity is covered under following sections-

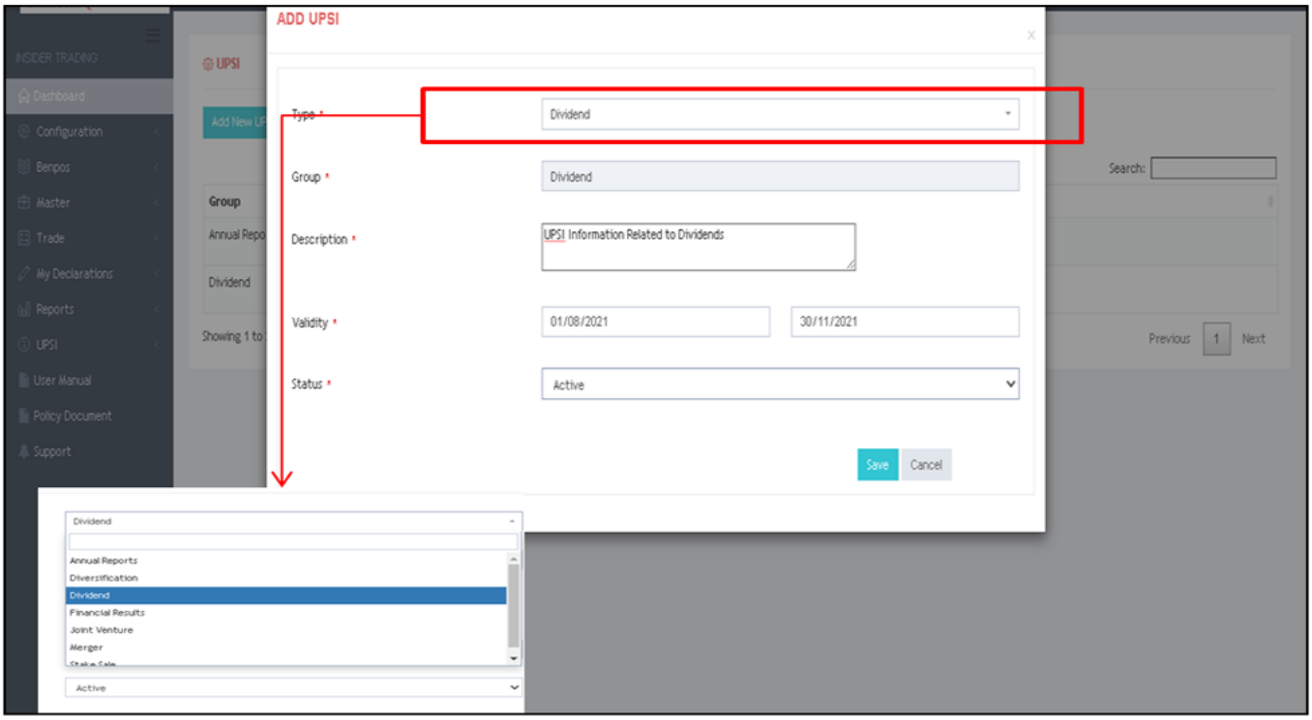
a. UPSI Groups

Any Designated person can create a UPSI Group based on their department or UPSI type or any activity they are currently working on those deals with UPSI. In case you are a part of any UPSI Group, the same will be reported to you in email alerts and you can see that Group under the header "**UPSI Groups**" in section **UPSI** as shown below. Only users who are added to a group can view that group details



b. Adding a new UPSI Group

Click on "Add New UPSI Group" to start creating a UPSI Group. **UPSI Types** are pre-defined as per Company Code of conduct policy. Multiple UPSI Groups of same type can also be created. Also, UPSI Groups created are visible to only their members and/or Compliance Officer(s)

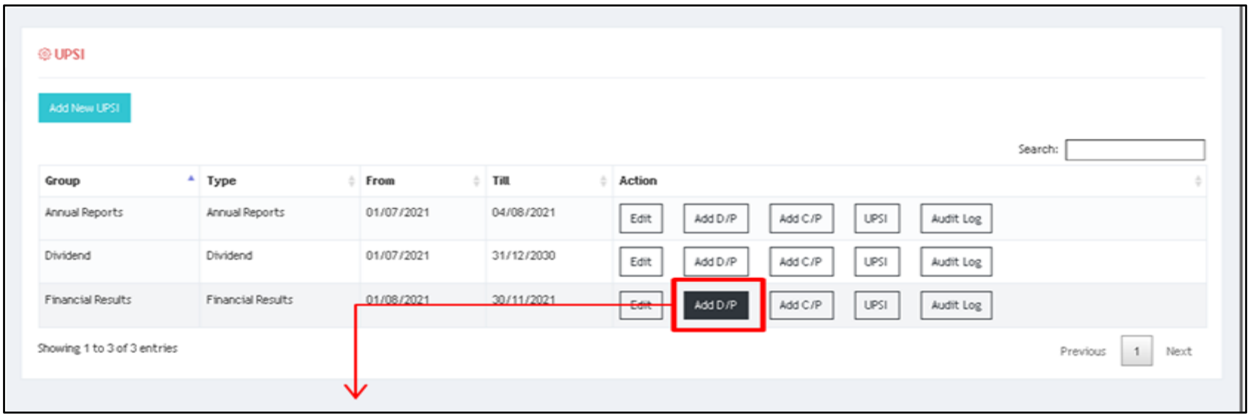


UPSI Group Key Details include

- UPSI Type (EG: Financial Info, Audit, Merger, Acquisition, Investment etc.)
- Validity (Group valid from and to dates)
- Status (Weather the Group is currently Active or In Active)

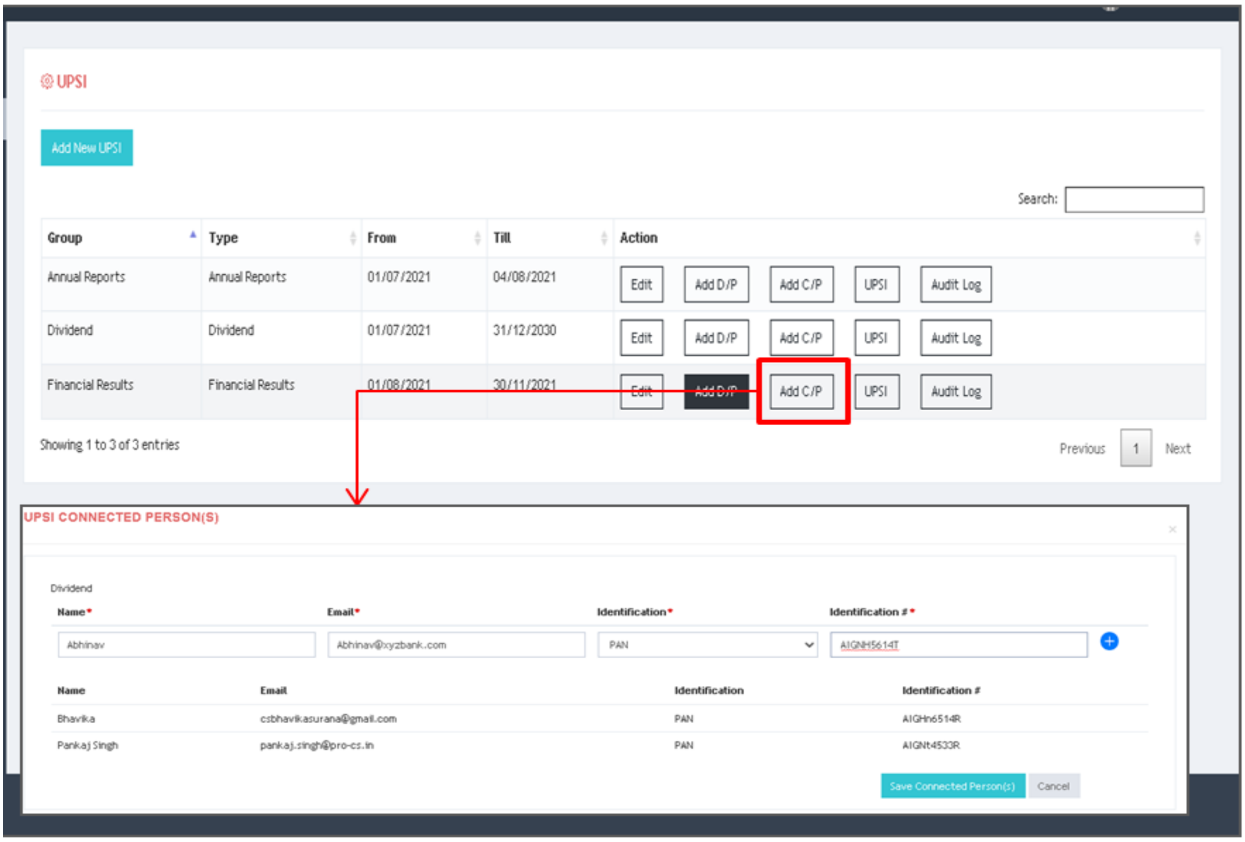
c. Adding a Designated Person to the UPSI Group

Use Add D/P button to add multiple Designated Persons/ Company employees to the Group. This signifies the users who are privy to the UPSI information/ group being created



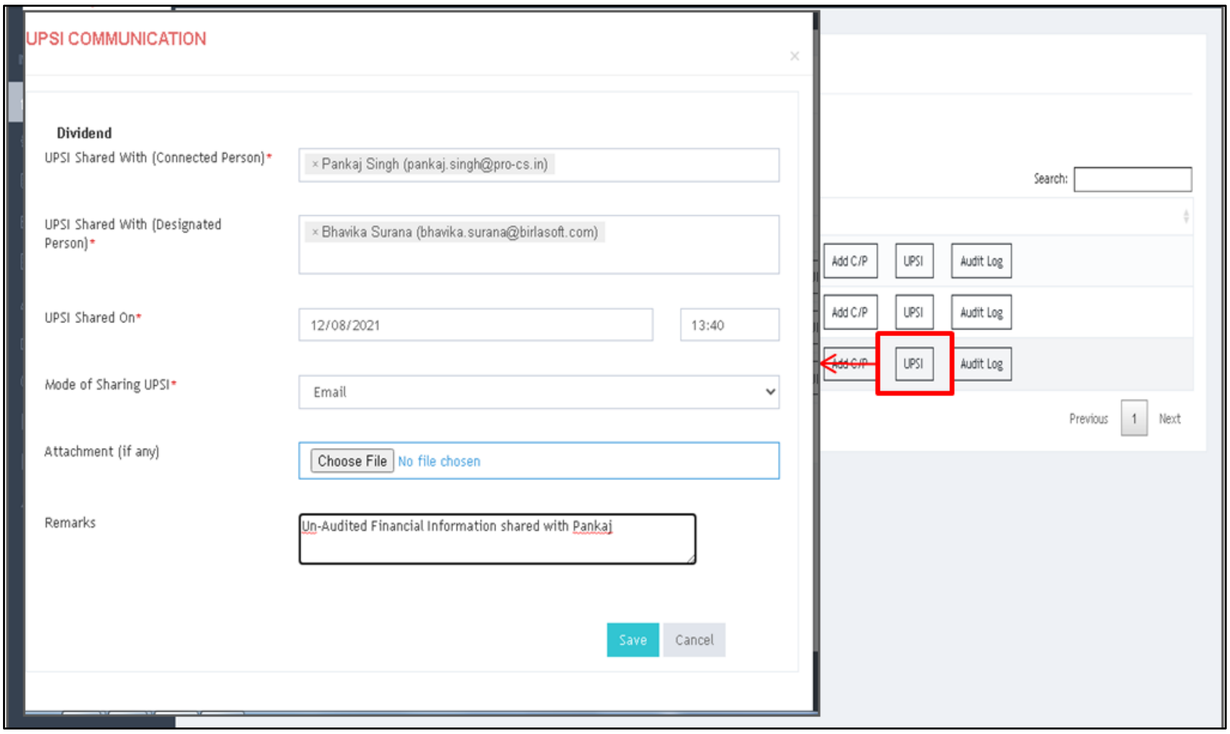
d. Adding Connected Persons with whom UPSI is shared

Use Add C/P button to add Connected Person details like Name, PAN (Or any other identification) & Email of Connected Person



e. Adding UPSI Information

Use Add UPSI button to add UPSI Information sharing log

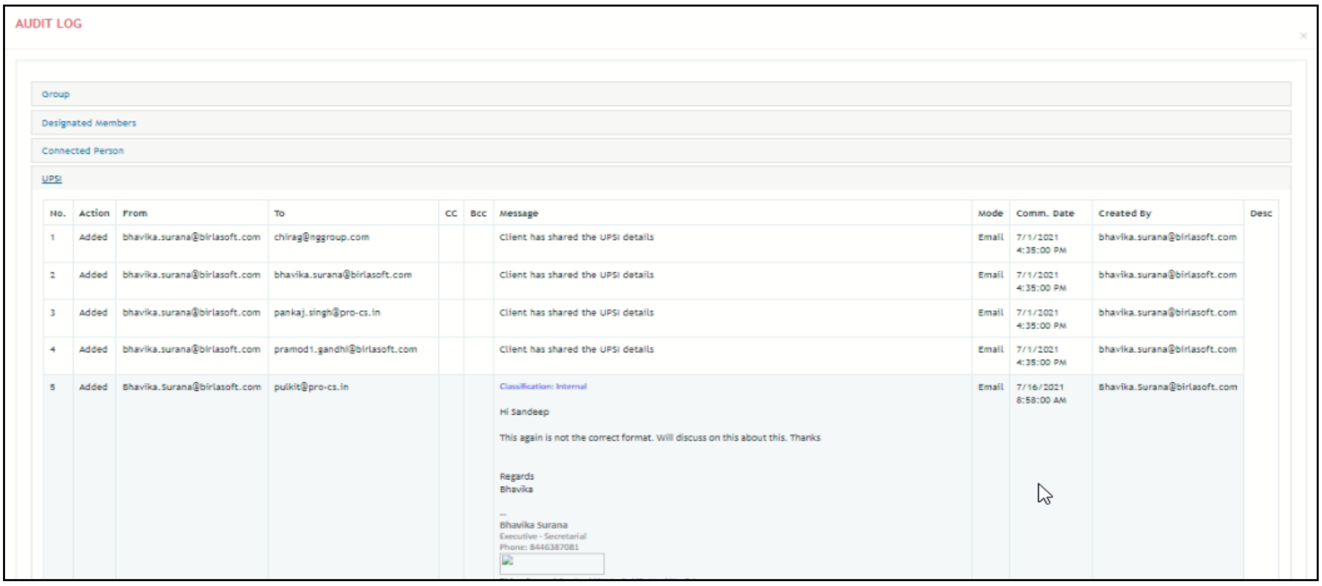


Key details include

- UPSI Shared with (Connected and Designated Persons Name You have shared UPSI with)
- UPSI Shared On (Date and Time of Sharing UPSI information)
- Mode of Sharing UPSI (Email, Phone, SMS, WhatsApp, Physical)
- Attachments & Remarks

f. UPSI Group – Audit log Information

Click on the Audit Log button against the UPSI group to review the complete Audit Logs of DP's, Connected Persons and UPSI details added by Designated persons



05. UPSI Email based Reporting

Since Providing UPSI information by coming to system every now and then can be a nit cumbersome for Designated Persons, a dedicated email id is defined to share the details of the UPSI system with the proCS application. The method by which the UPSI can be reported via emails is provided below-

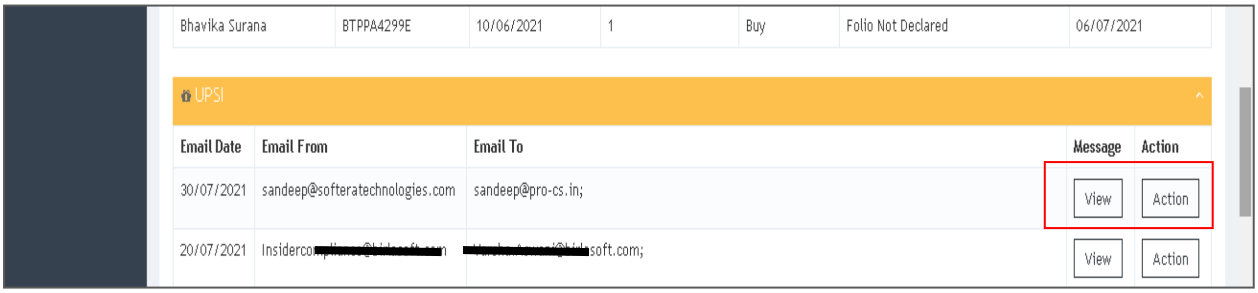
a. Reporting UPSI Emails

When sharing any UPSI via email, please mention the following dedicated email id in cc or bcc

UPSI@birlacable.com

b. Verifying UPSI Information submitted via emails

On the Dashboard, the UPSI emails reported via dedicated UPSI email id are shown to the sender/user on his account under section "UPSI".



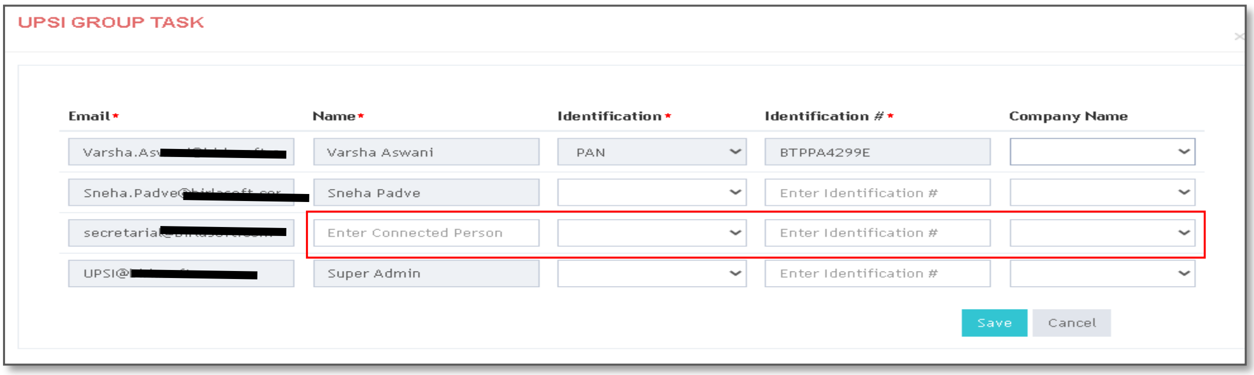
Bhavika Surana	BTPPA4299E	10/06/2021	1	Buy	Folio Not Declared	06/07/2021

UPSI

Email Date	Email From	Email To	Message	Action
30/07/2021	sandeep@softeratechnologies.com	sandeep@pro-cs.in;	View	Action
20/07/2021	Insiderco[redacted]	[redacted]soft.com;	View	Action

c. Doing KYC for unidentified Connected persons

If any email id that you have shared email with is not yet reported in the system, the system will create a UPSI actionable for you to just provide the PAN details of the connected person with whom the UPSI email was shared with along with nature of UPSI or Company Name as shown below. Once reported, the task will be completed and the details will be added to your UPSI digital database



UPSI GROUP TASK

Email*	Name*	Identification*	Identification #*	Company Name
Varsha.Asv[redacted]	Varsha Aswani	PAN	BTPPA4299E	
Sneha.Padve[redacted]	Sneha Padve		Enter Identification #	
secretaria[redacted]	Enter Connected Person		Enter Identification #	
UPSI@[redacted]	Super Admin		Enter Identification #	

Save Cancel

For Support / Inquiry –
support@pro-cs.in

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