User Manual

Insider Trading Compliance Solution

For

Mahanagar Gas Limited

Submitted by:

proCS

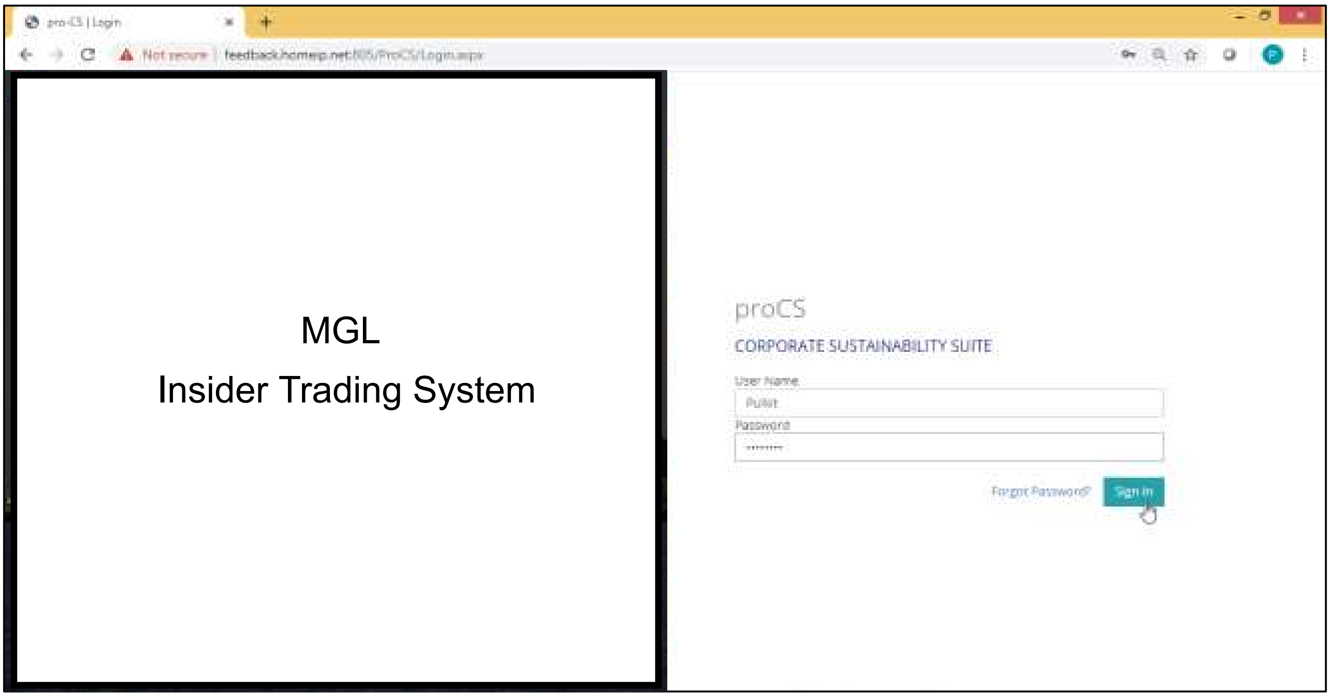
INDEX

1. Login

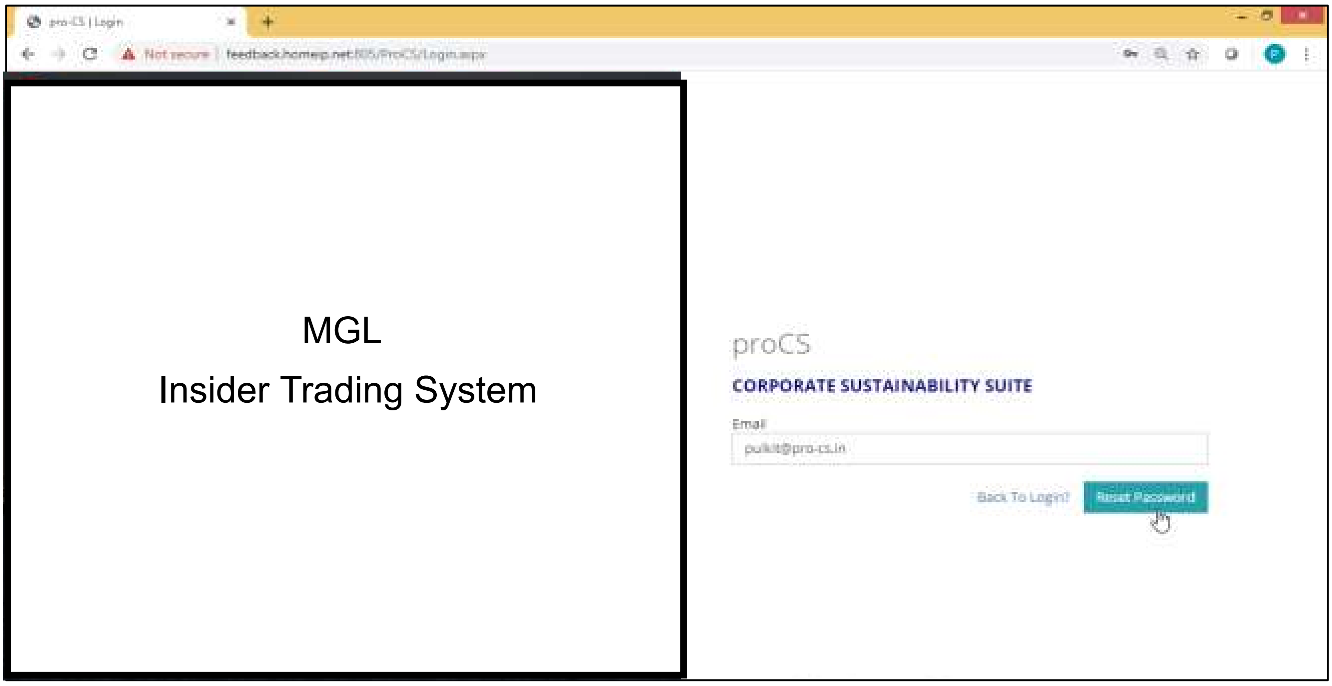
Welcome to proCS Insider Trading Solution.
We will start from logging in to your proCS Insider Trading Compliance system and systematically guide you through the app.

On your PC or Laptop, please open the below link using any latest web browser – Internet Explorer/ Chrome / Firefox/ Safari.

Http://Mgl.pro-cs.in/procsdll/login.aspx

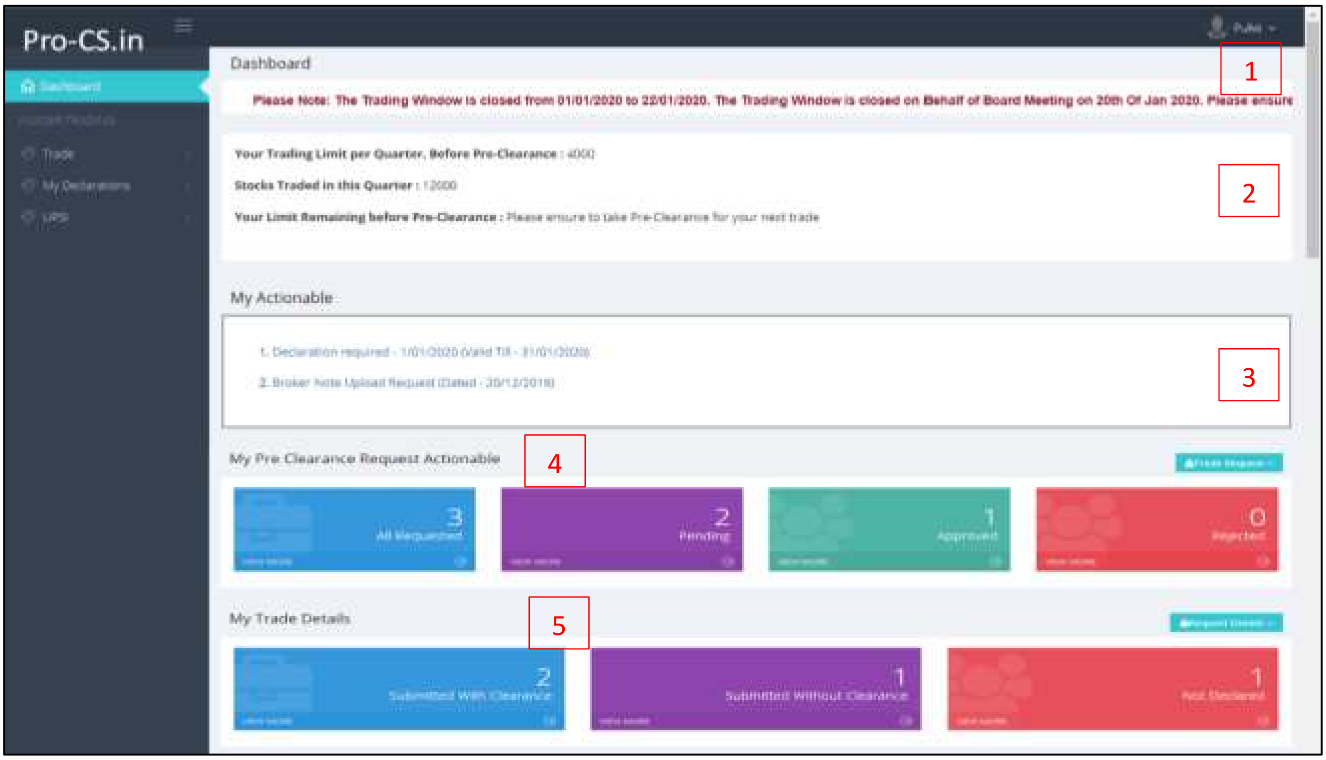


- Forgot Password? – "Enter your official email id to retrieve your current password on your email"



2. My Dashboard

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



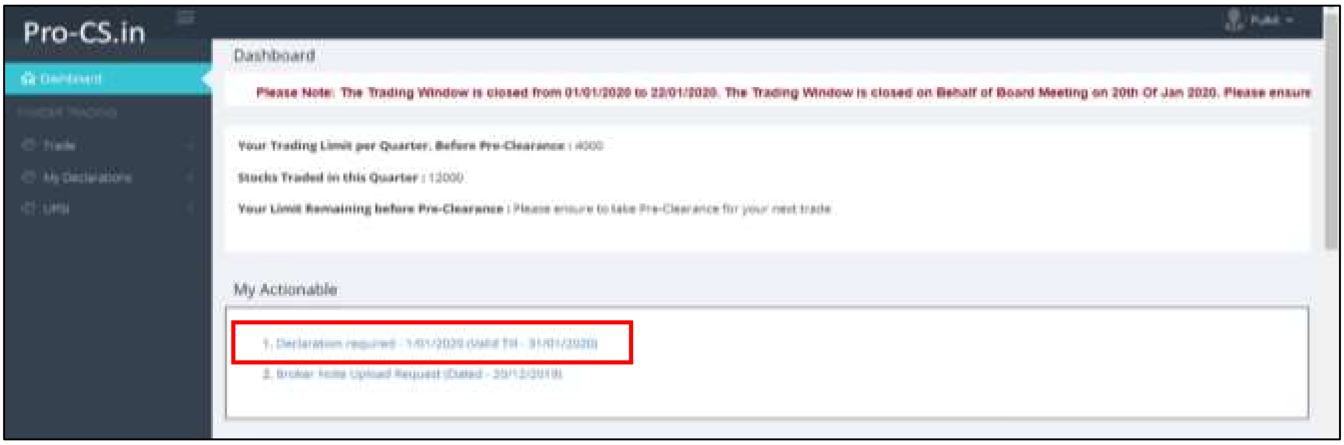
<u>Dashboard Details:</u>

1. **RSS Feed**: The news feed provides Users the information about the upcoming Trading Window restrictions.
2. **Your Trading Details:**
    a. **Your Trading Limit per quarter before you request for a pre-clearance**
    b. **Stocks Traded in this quarter –** Number of Stocks that have been traded by you in this quarter
    c. **Your Limit remaining –** Shares remaining to be traded before you have to take a pre-clearance approval
3. **My Actionable:**
    a. **Declaration Required –** Task reminder to submit your declaration for the period before the "**Valid till**" Date
    b. **Broker Note Upload –** <u>Non Compliance event.</u> For Stocks traded for which no pre-clearance was taken by user, system creates a task for user to upload their Broker Note and notify the compliance officer(s).
4. **My Pre Clearance Requests**
    a. **All Requested –** Total Number of all the pre-clearance requests that you have submitted
    b. **Pending –** All the requests that you have submitted and <u>are pending for approval</u> from compliance officer
    c. **Approved –** All the requests that you have submitted and are <u>approved by compliance</u> officer
    d. **Rejected –** All the requests that you have submitted and are <u>rejected by compliance</u> officer
5. **My Trade Details**
    a. **Submitted with Clearance –** Broker Notes uploaded against Approved Pre-clearance requests
    b. **Submitted without Clearance –** Broker Notes uploaded without Pre-clearance, but uploaded before NC
    c. **Not Declared –** <u>Non Compliance Events</u>, Trades without pre-clearance or notification to compliance officer

3. My Actionable

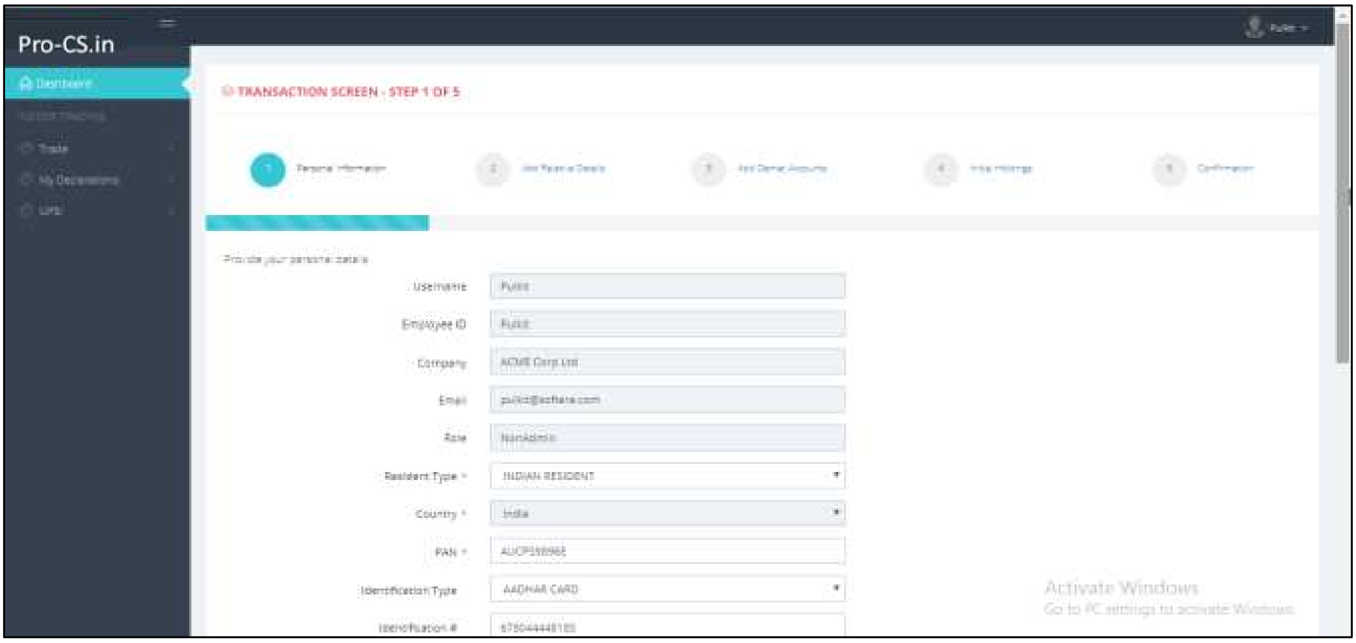
a. Declaration Submission

As per SEBI PIT regulations of 2019, 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 details as provided in the steps below –

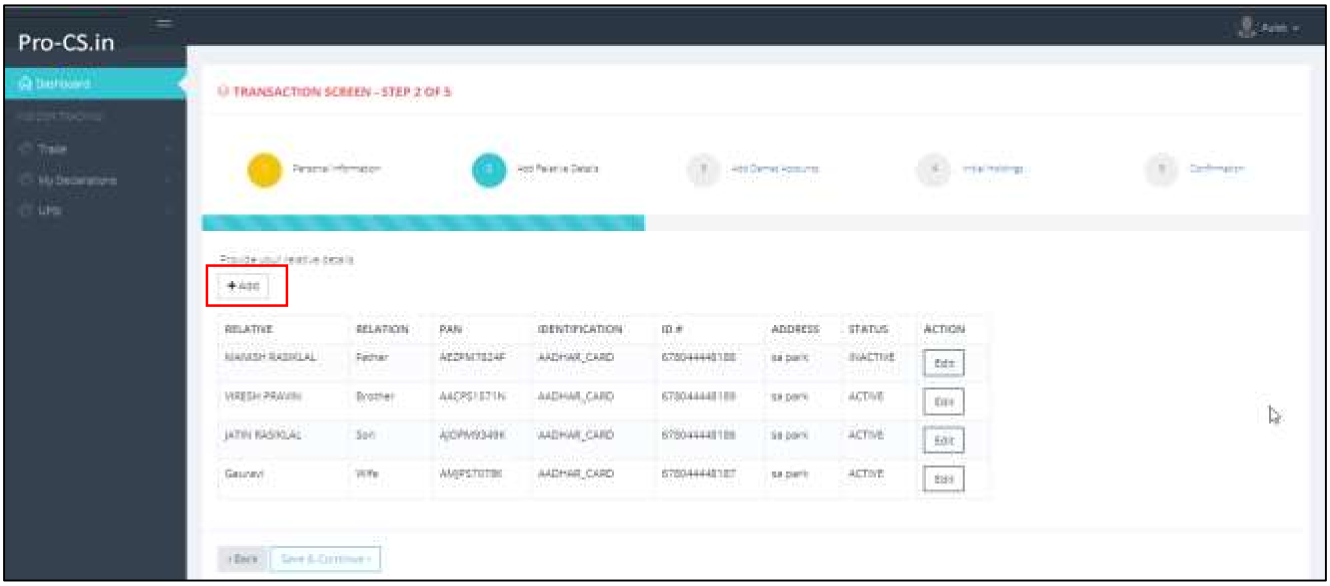
Step 1 of 5 – Personal Details



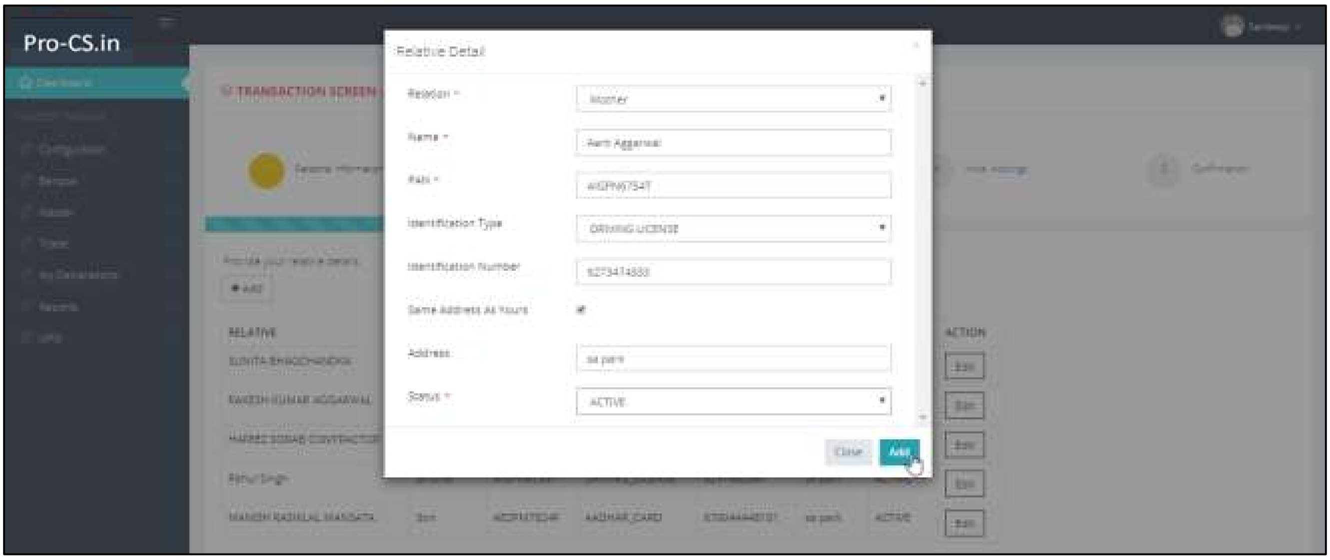
Mandatory Information Required from Users-

1. Resident Type – (Indian / Foreign Resident)
2. Mobile No.
3. Address
4. All other fields are optional. Scroll Down the page to click on [Save and Continue >]

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



a. To add a new Relative, click on the **+Add button** as shown above, if you don't have any Relative information to declare, press [Save and Continue] to skip to next step



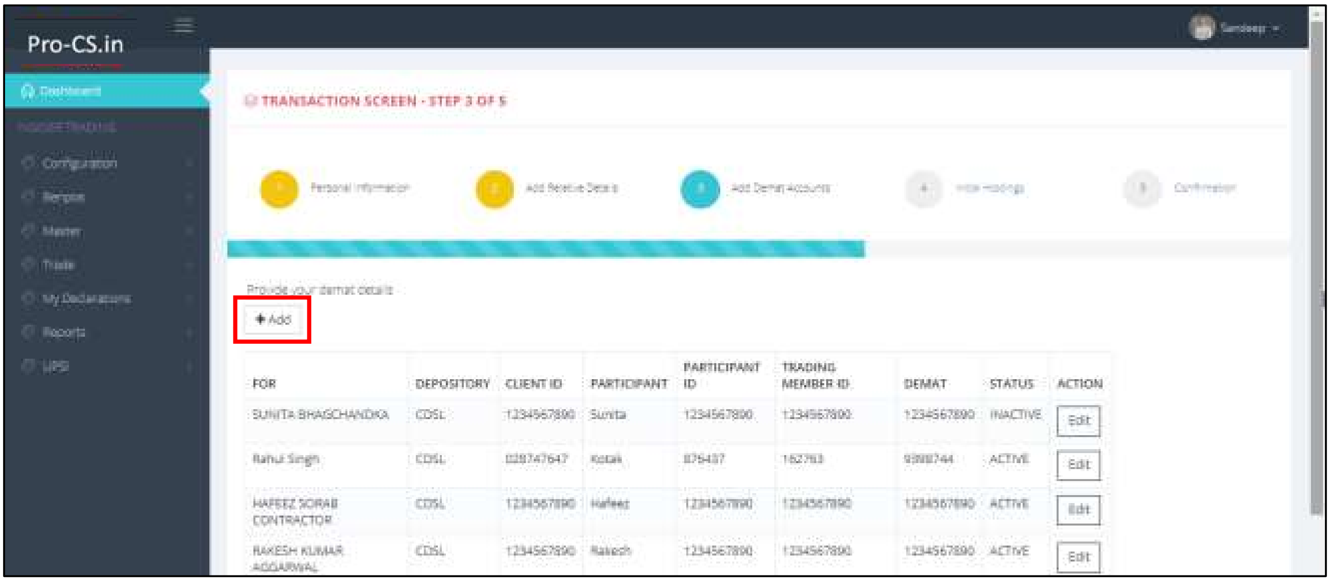
b. Mandatory Information Required for adding Relative of Users-

1. Relation – Select the Type of Relation with this person
2. Name
3. PAN
4. Status – Select **Active** by Default (Select **In-active** in case the User is no more an Insider, is deceased or no longer in your direct relation)
5. All other fields are optional. Scroll Down the page to click on Add to add this relative

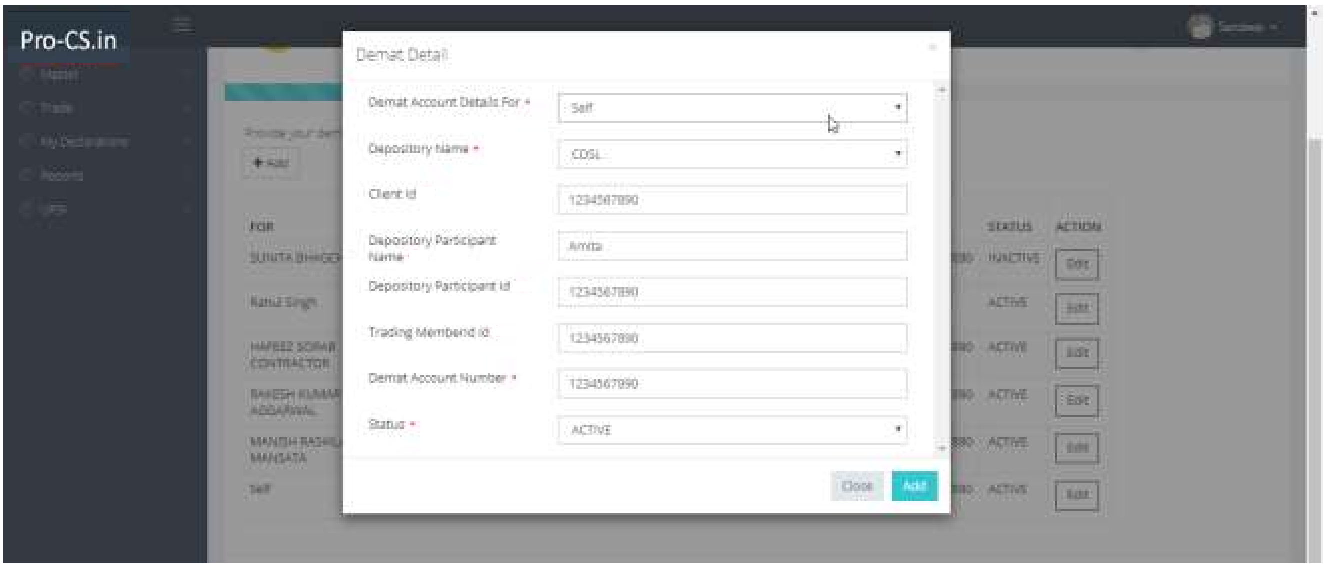
c. Once a Relative is Added, you can also edit their information using the "**Edit**" option against the Relative Name

d. Once all relatives have been added or their information modified, please click on [Save and Continue]

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



a. To declare DEMAT accounts for yourself and your relatives, click on the **+Add button** as shown above, if you don't have any DEMAT information to declare, press [Save and Continue] to skip to next step



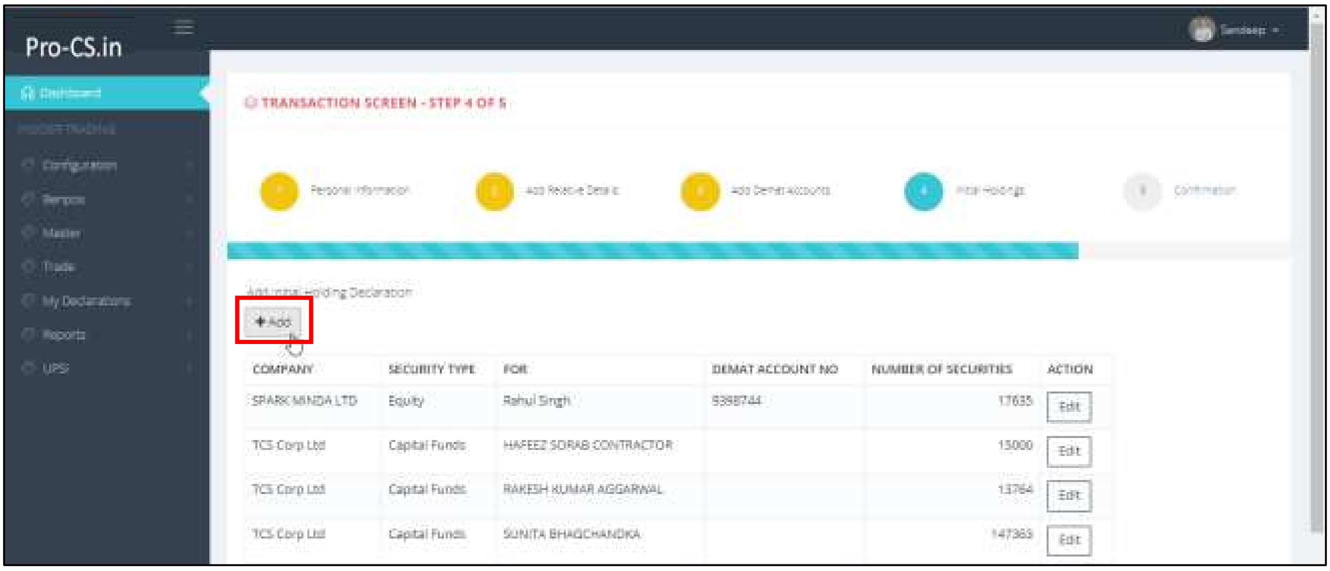
b. Mandatory Information Required for adding DEMAT Account Details for Relative and for Self -

1. DEMAT Account Details for – Select "Self" for your own details or Other Relative Name
2. Depository Name
3. DEMAT Account Number
4. Status – Select **Active** by Default (Select **In-active** in case the User is no more an Insider, is deceased or no longer in your direct relation)
5. All other fields are optional. Scroll Down the page to click on Add to add this relative

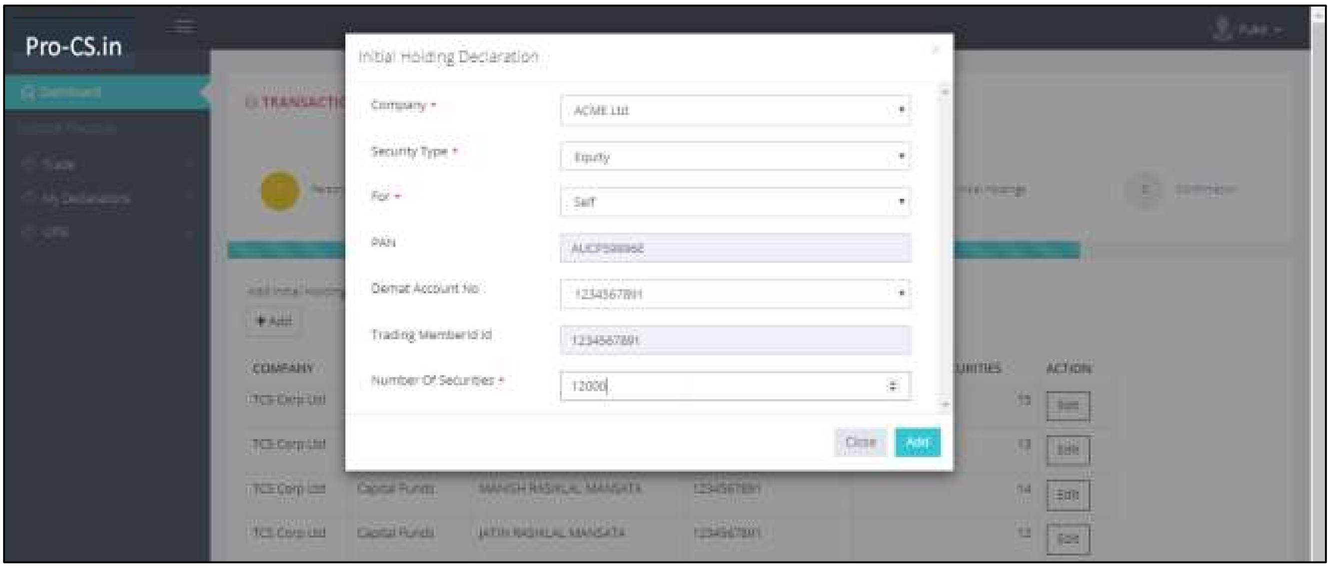
c. Once a DEMAT Account information is Added, you can also edit their information using the "**Edit**" option against the Self/Relative Name

d. 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]



a. To declare Initial Holdings for yourself and your relatives, click on the **+Add button** as shown above, if you don't have any Holding information to declare, press [Save and Continue] to skip to next step



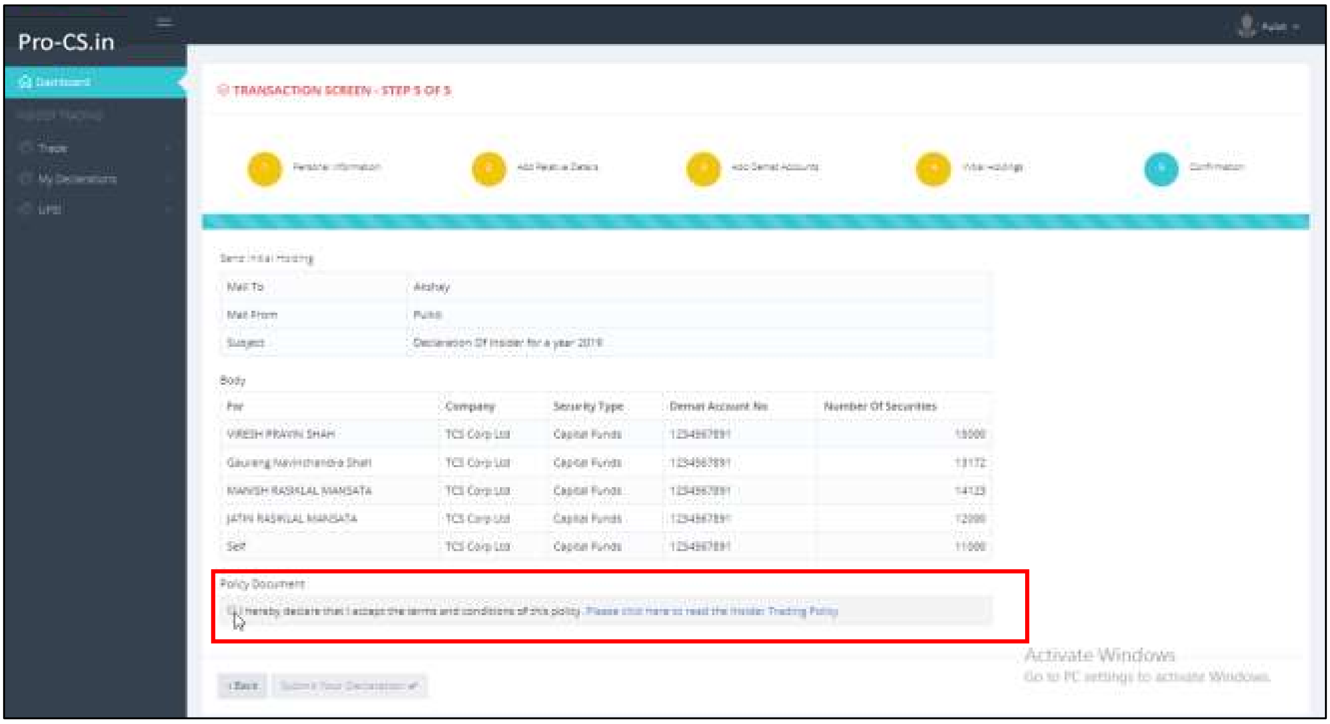
b. Mandatory Information Required for adding DEMAT Account Details for Relative and for Self -

1. Company
2. Security Type – Equity/Debentures/ESOP etc.
3. For – Self or Relative
4. DEMAT Account Number – Securities against DEMAT Account in case of multiple DEMAT accounts registered
5. Number of Securities held
6. All other fields are optional. Scroll Down the page to click on Add to add this relative

c. Once the Initial Holding information is Added, you can also edit their information using the "**Edit**" option against the Self/Relative Name

d. Once all DEMAT Accounts have been added or their information modified, please click on [Save and Continue]

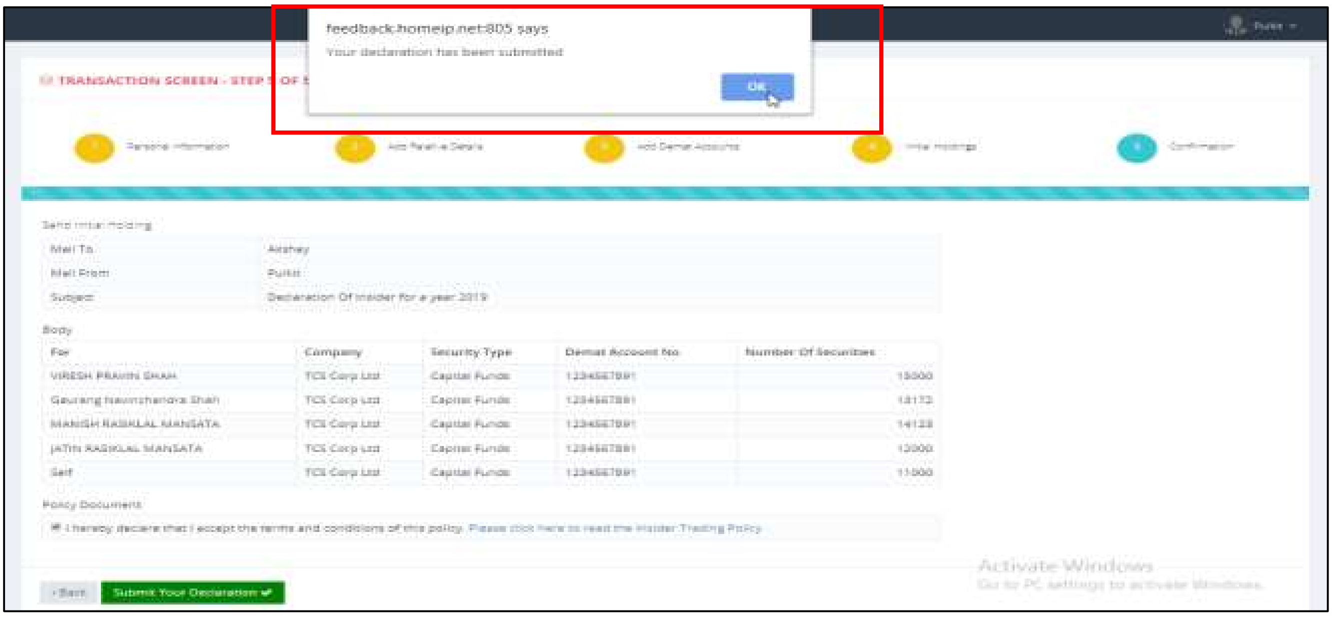
Declaration Submission [Step 5 of 5 – Final Confirmation]



a. To provide a final confirmation of your declaration, it is pivotal to <u>first read and confirm on the Insider Trading policy provided by your organization</u>. The Users cannot submit their declaration unless they confirm on the Insider Trading Policy document as shown below

b. The Link above can be used to read and confirm on the Insider Trading Policy.

c. Once confirmed, please click on [Submit Your Declaration] to complete your Periodic Declaration.

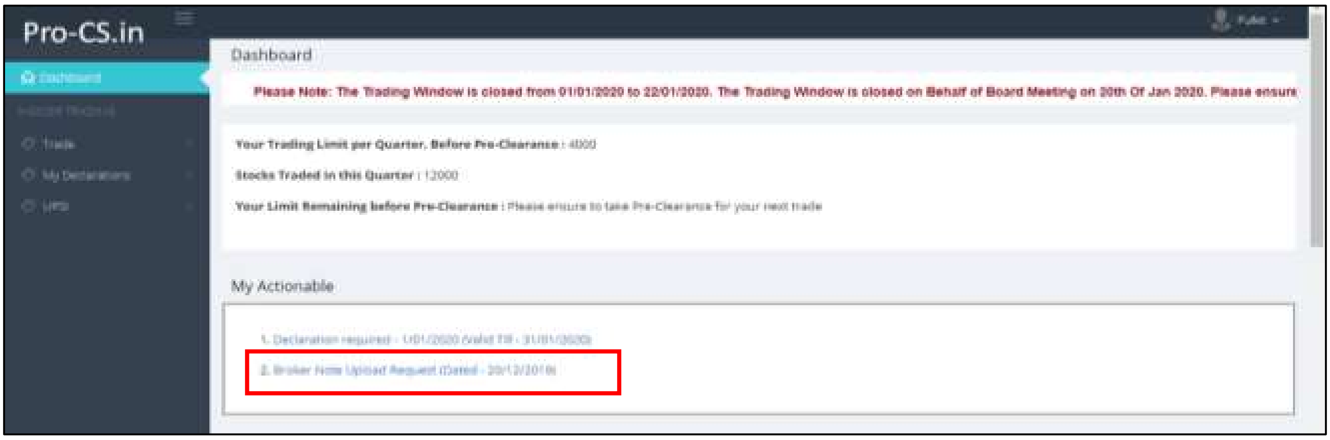


b. Broker Note Upload (Non-Compliance Tasks)

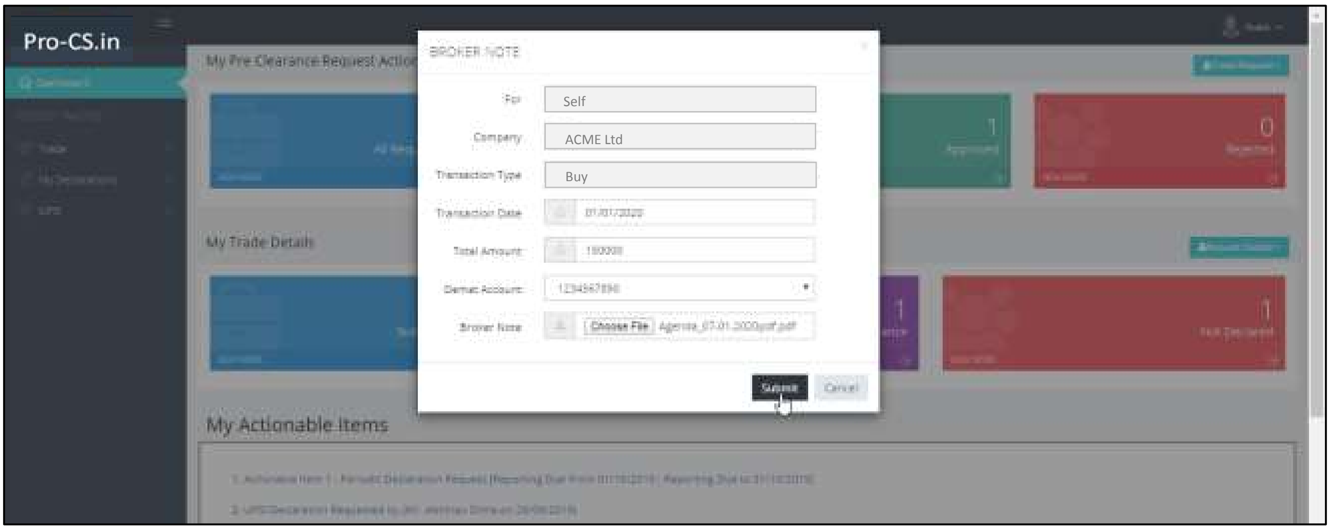
As per SEBI PIT regulations of 2019, Users are required to take a pre-clearance request before their trade exceeds a pre-defined limit as desired by their organization, for every quarter. However, if Users don't take an approval, neither inform the Compliance officer or upload the Broker Note within two days of trade, it will lead to creation of a Non-Compliance event.

- **Reporting on a Non –Compliance Event.**

  Select the Non Compliance Actionable on the Dashboard under My Actionable Header, as shown below



The following Pop-up screen will appear with User required to submit the following information



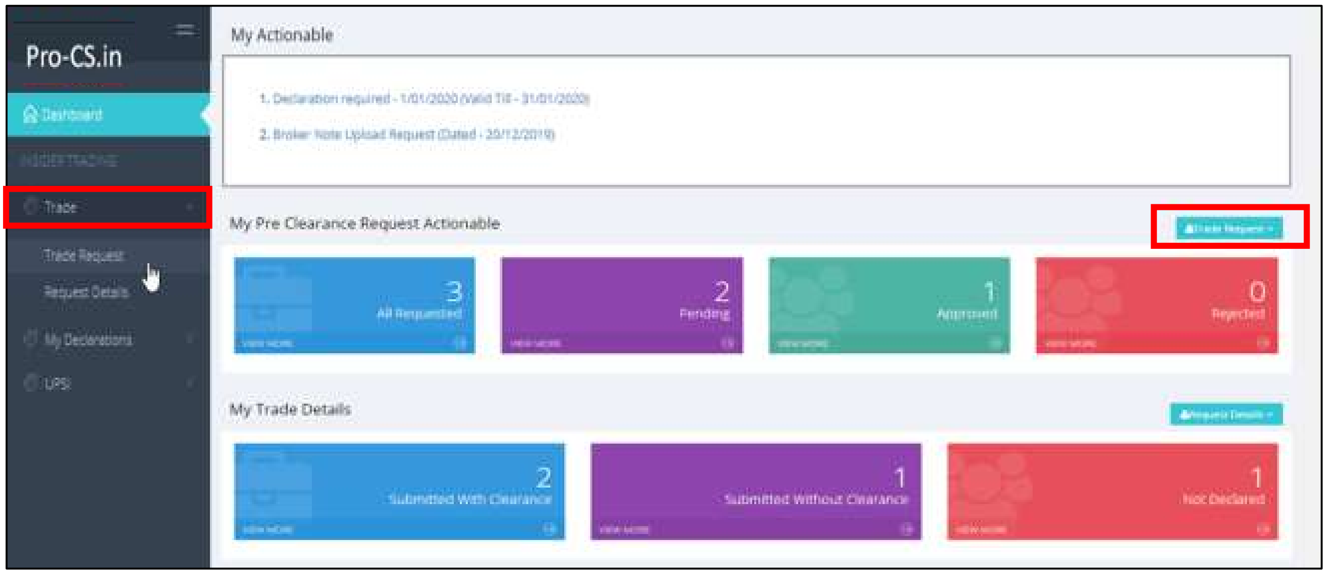
1. Transaction Date
2. Transaction Amount
3. DEMAT Account
4. Broker Note – Upload the Soft Copy of the Broker Note of the Non Compliance Trade
5. All other fields are pre-filled by System and Non editable.

Once the Details of the Non-Compliance Trade have been submitted and Broker Note Uploaded, please click on Submit to close the reporting on your Non-Compliant Trade.

4. Pre-Clearance Request – For Trading

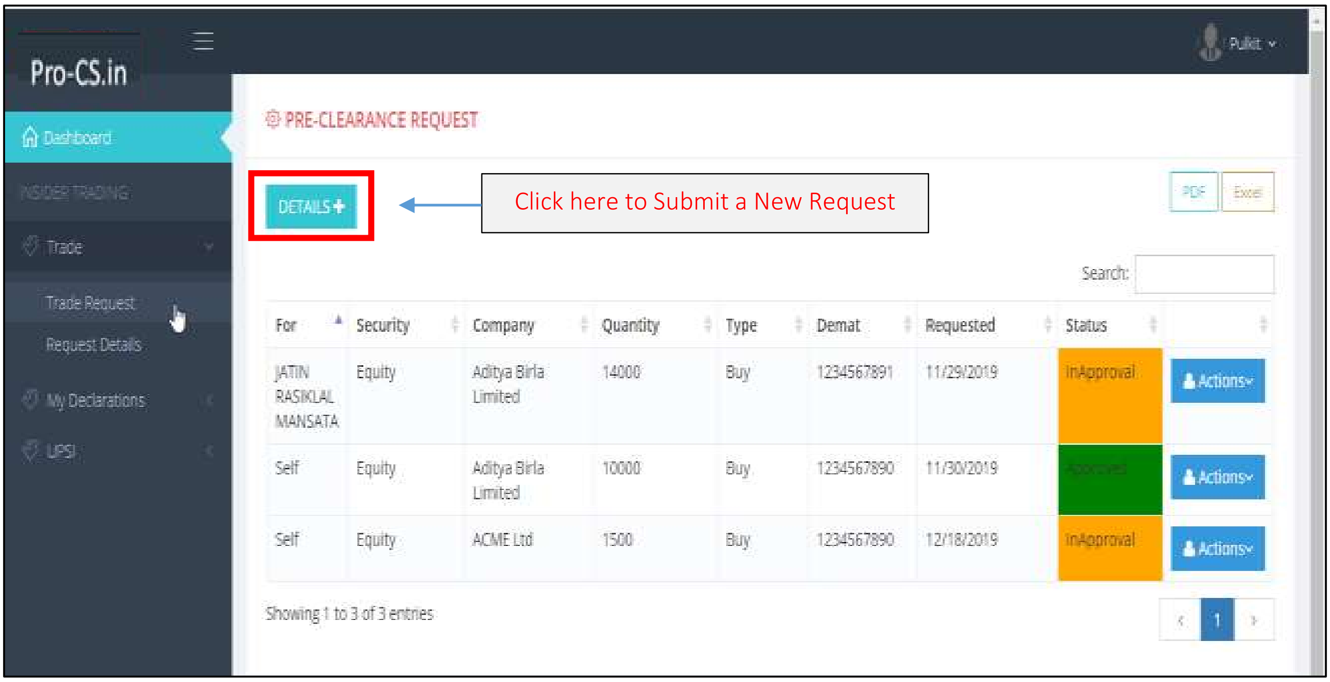
a. Request Submission

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.

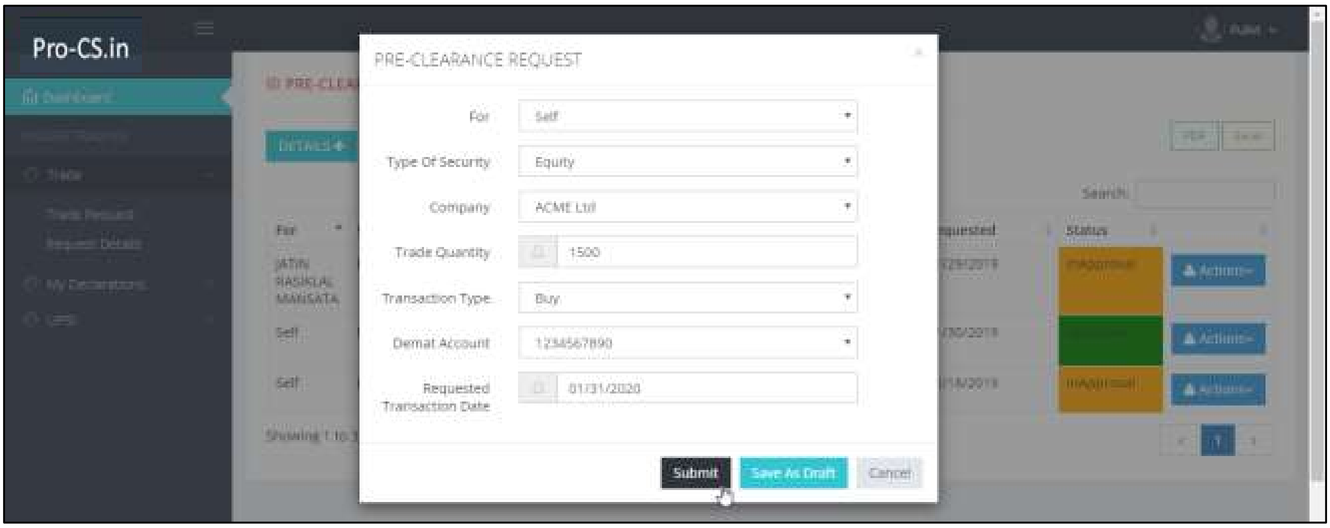


Pre-Clearance Request Listing

- The pre-Clearance request details are provided by User and their relatives as shown in the image below
- In order to add a new Pre-Clearance request, please use the "**Details+**" or "**Add New**" button as shown below.

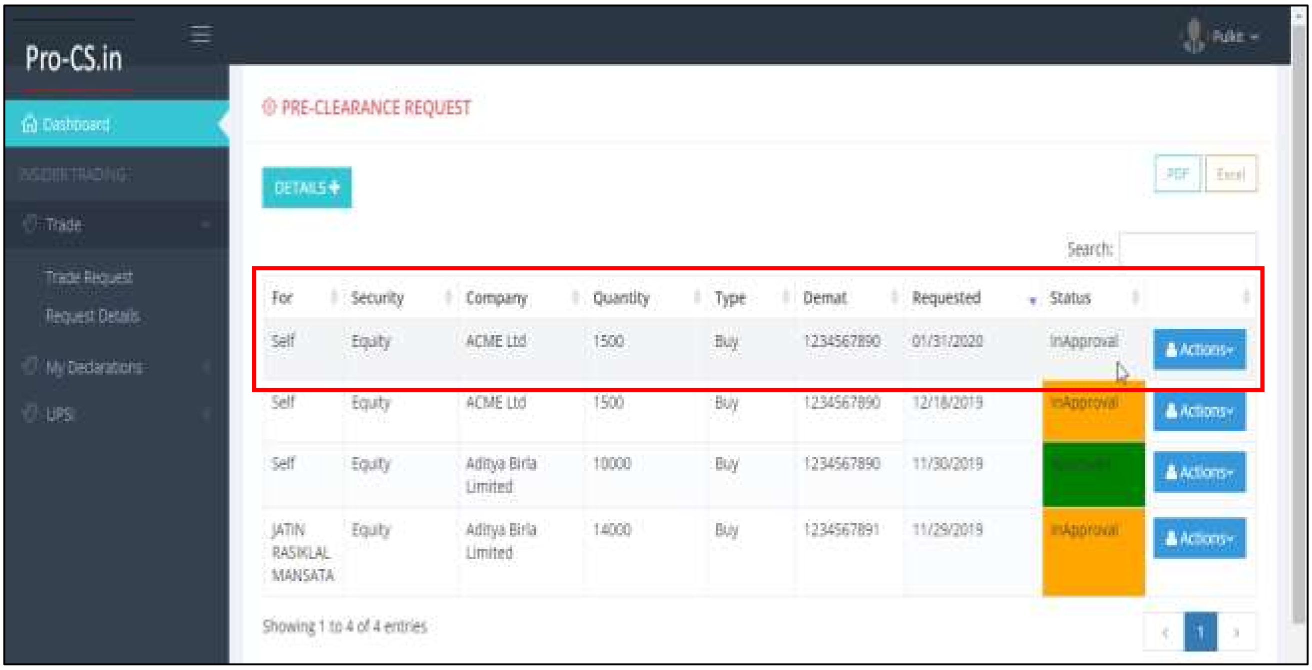


The following Pop-up screen will appear with User required to submit the following information



1. For – Self or Relative for whom the Pre-Clearance is required
2. Type of Security to be traded
3. Company
4. Trade Quantity – Number of Shares required to be traded
5. Transaction type – Buy/Sell
6. DEMAT Account
7. Requested Transaction Date – Tentative Date of Transaction

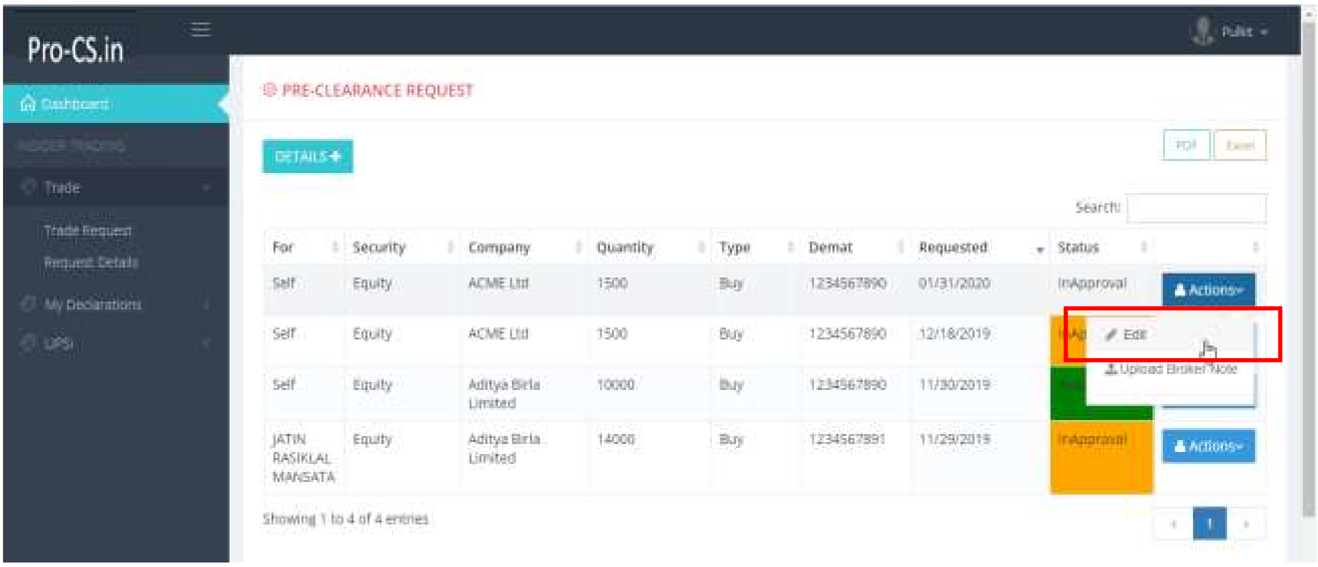
When completed click on **"Submit"** to submit your request. The request will be shown as "In Approval" until reviewed by the Compliance officer.



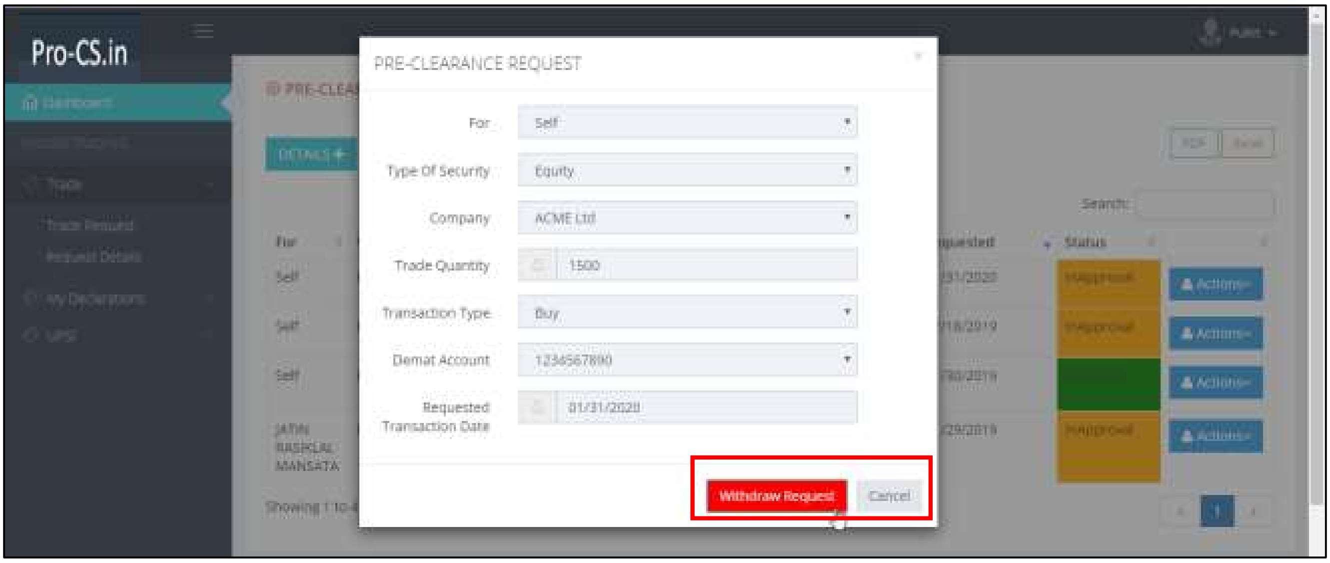
<u>Note – On Approval or Rejection by Compliance Officer, User will receive an email notification with review details</u>

b. Request Withdrawal / Edit Request

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.

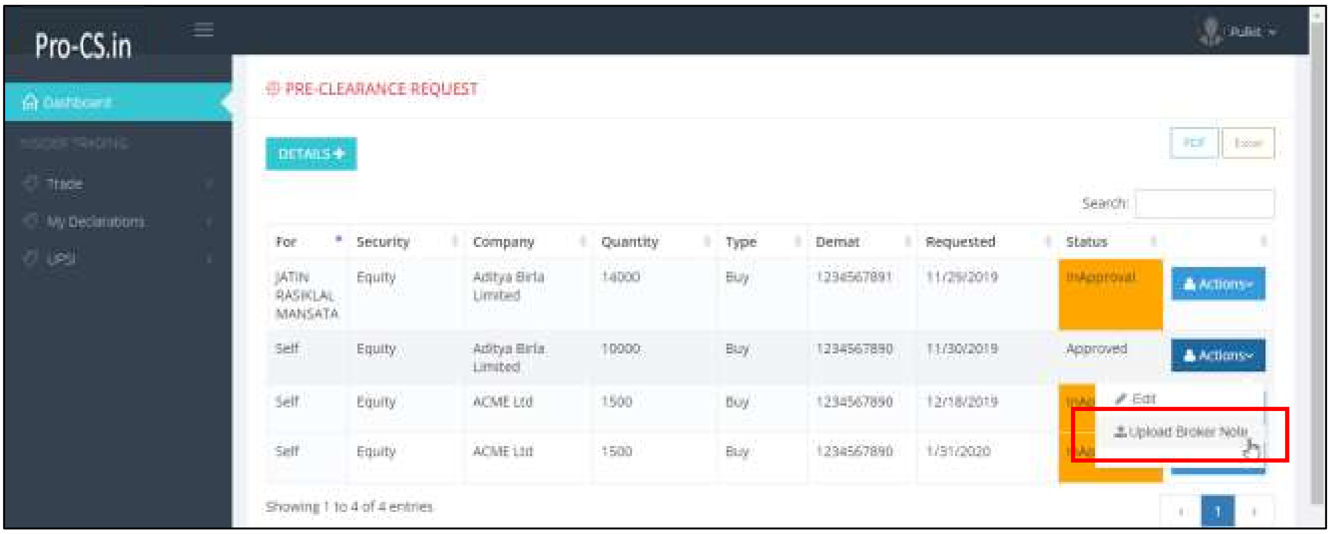


Please Note:

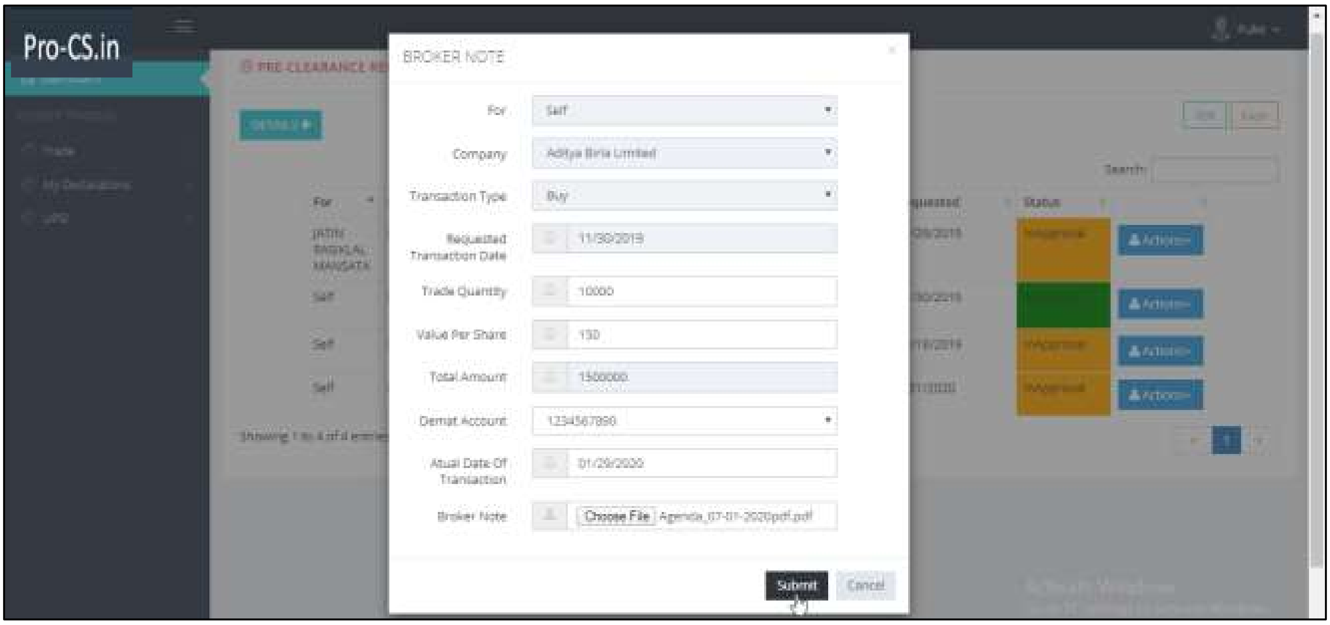
1. The requests that <u>are In-Approval stage</u> can only be Withdrawn
2. On Request Withdrawal, Users can re-enter the details and re-submit their request for approval
3. The Requests cannot be edited once Approved
4. You will receive email alert with request review (Approved or Rejected) along with Compliance Officer comments directly on email
5. The Status for Approved or rejected approval requests will change accordingly in the listing

c. Uploading Broker Note against Requests

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



The following Pop Up appears for Broker Note Upload.



Mandatory Information Required for Broker Note upload and closure-

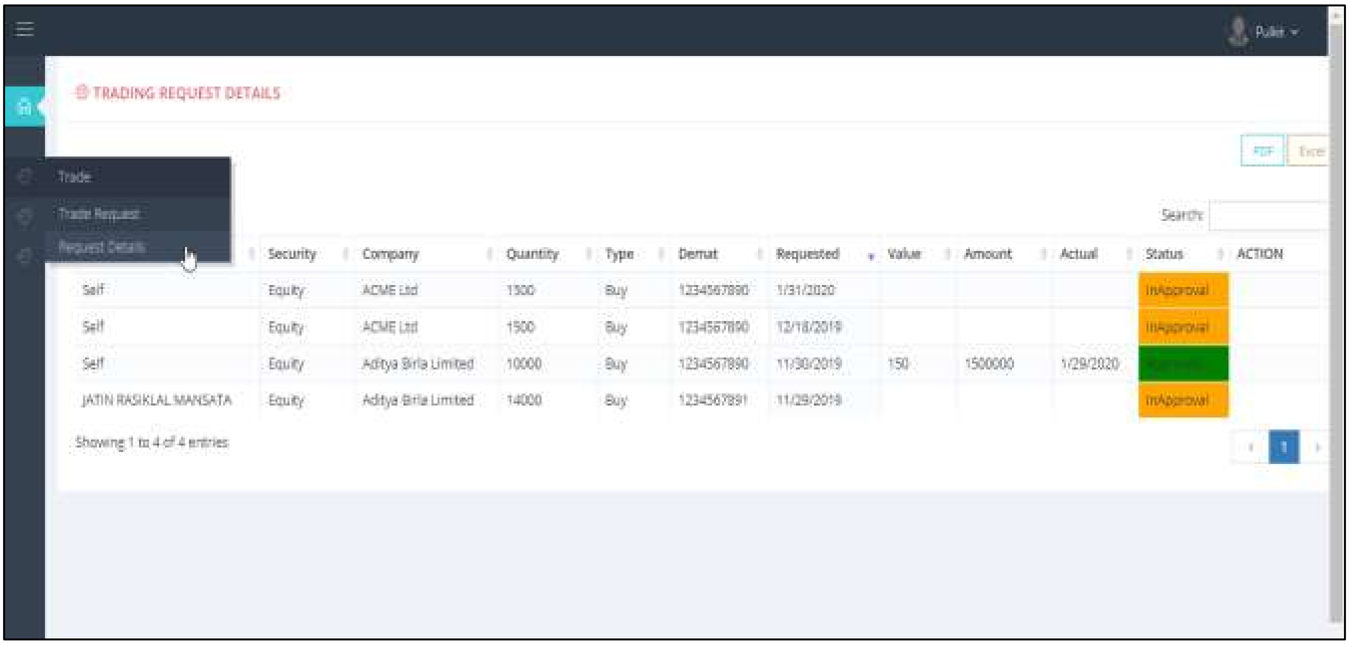
1. **Trade Quantity** – Number of Shares Traded
2. **Value per Share** – Price per Share Traded
3. **DEMAT Account** – Account against which shares have been traded
4. **Actual Date of Transaction**
5. **Upload Broker Note**

Once all the fields have been submitted and proper Broker Note uploaded, please click on Submit to submit your Note.

!! Important Note – This action is irreversible so please take care in submitting valid details and actual Broker Note Receipt.

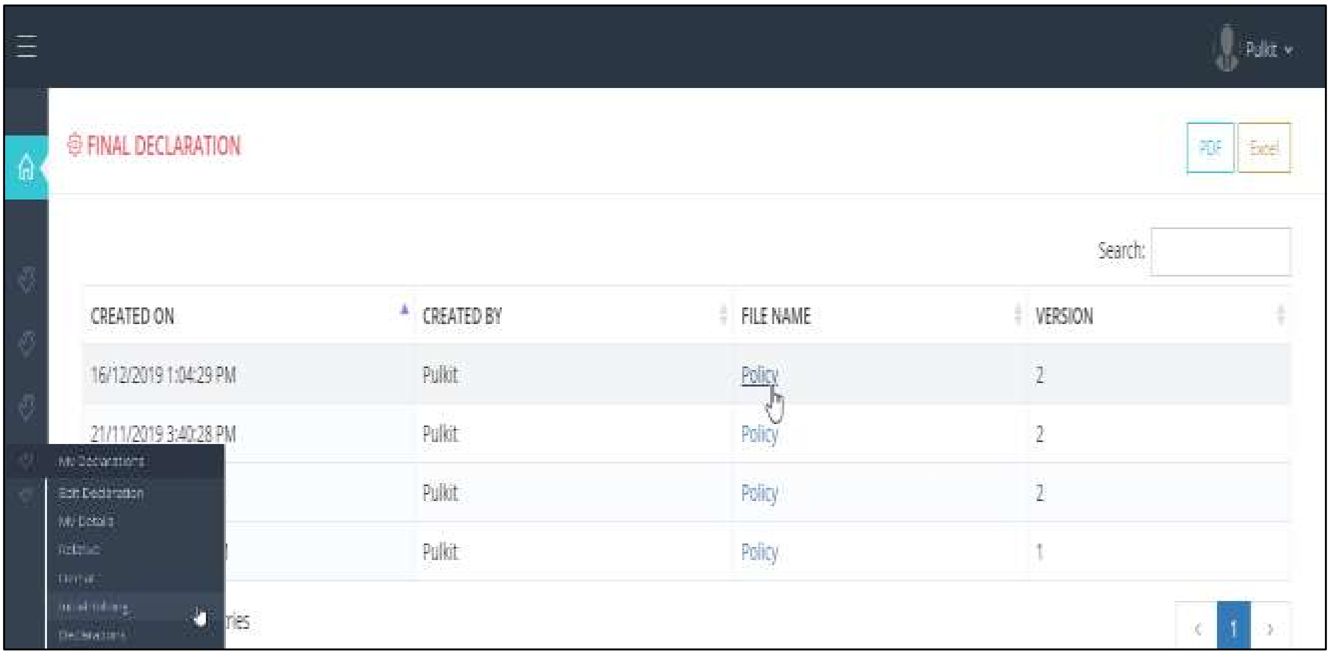
5. Trade Request Details

The Complete Trade details of the User are provided in this listing along with the statuses of you trade and the Broker Note details uploaded.



6. Declaration History

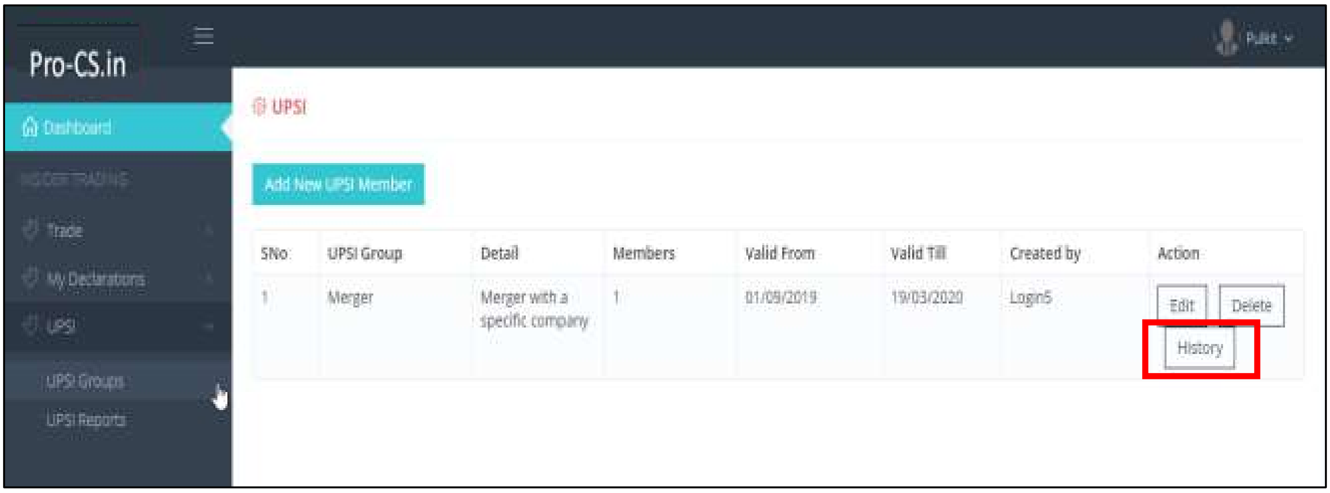
The Complete Declaration details of the User are provided in this listing along with the versions of their declarations



7. UPSI Groups Information

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

- Such groups are created by Compliance officers and users are added to these groups.
- Users can log onto the UPSI Groups page to view their UPSI groups and fellow members

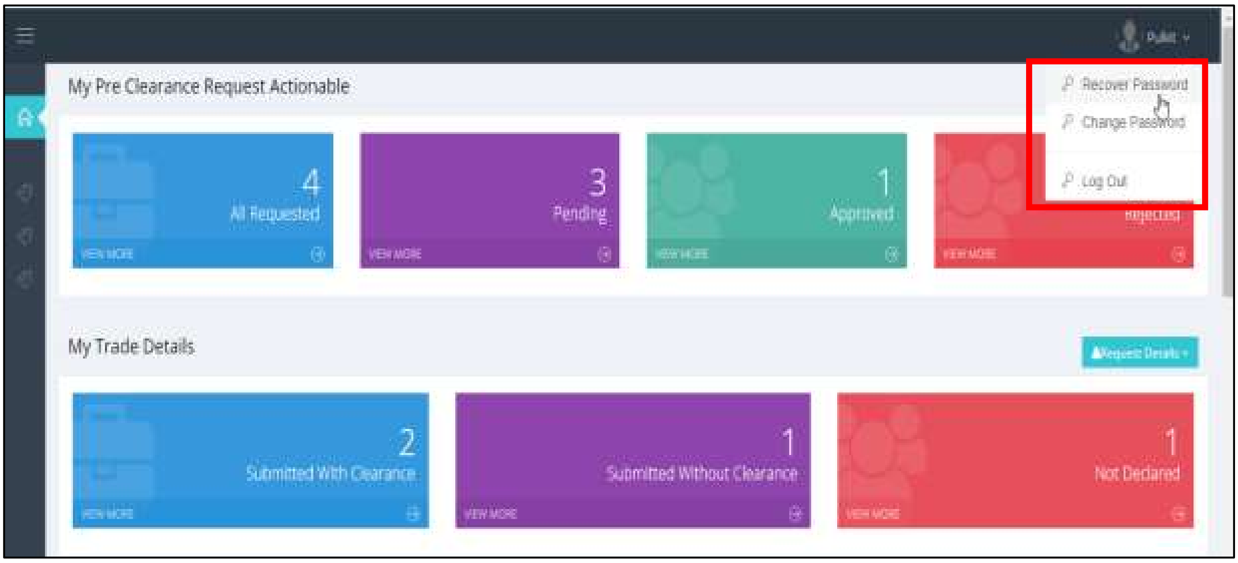


- Groups Users can further add or edit the User information, if access is provided else can check the complete version history with remarks and comments from other users

8. Reset Password

a. Retrieve Password

In order to recover your password on email, please select the "Recover Password" option from Profile menu as shown below against your name. Your existing password will be shared on your email id.



b. Change Password

- In order to change your existing password, please click on the "Change Password" link as shown in above image.
- Provide your current password
- Provide new password and confirm the new password.
- Press Save changes to confirm.

c. Log Out

Logs you out of the application and redirects you to home login screen. Please close the Browser, if required.