

User Manual

Prohibition of Insider Trading Compliance Solution

For



BIRLA CABLE LIMITED

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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>



BIRLA CABLE LTD.
(Formerly Birla Ericsson Optical Ltd.)

Online Portal
for
**Insider Trading
Compliances**

User Name

Password

[Forgot Password?](#) [Sign In](#)

The Page displayed will consist of two options –

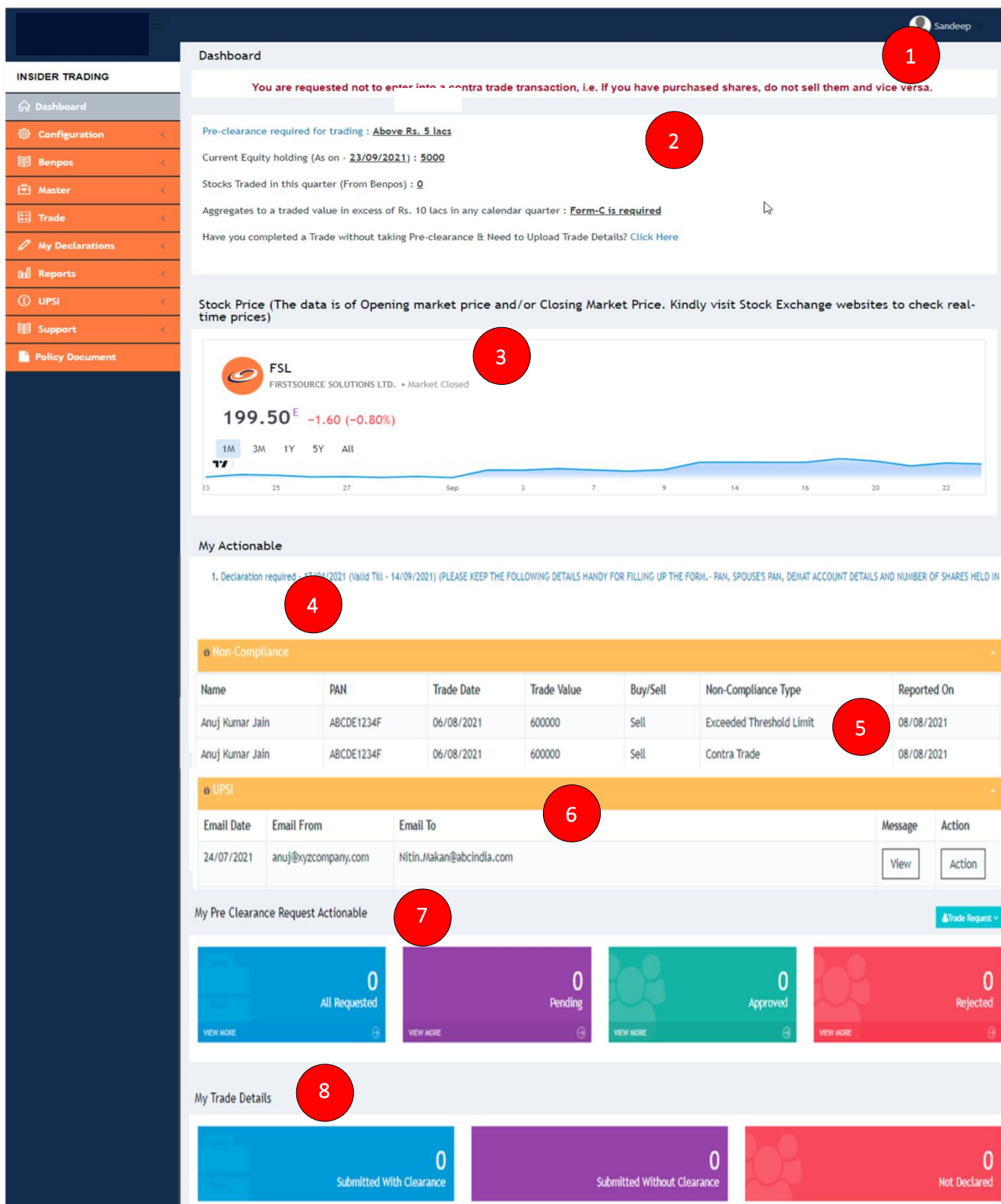
User Name: Your Official Email Id or Login ID As shared in Welcome Email

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-



INSIDER TRADING

- Dashboard
- Configuration
- Benpos
- Master
- Trade
- My Declarations
- Reports
- UPSI
- Support
- Policy Document

Dashboard

You are requested not to enter into a contra trade transaction, i.e. If you have purchased shares, do not sell them and vice versa.

Pre-clearance required for trading : **Above Rs. 5 lacs**

Current Equity holding (As on - 23/09/2021) : **5000**

Stocks Traded in this quarter (From Benpos) : **0**

Aggregates to a traded value in excess of Rs. 10 lacs in any calendar quarter : **Form-C is required**

Have you completed a Trade without taking Pre-clearance & Need to Upload Trade Details? [Click Here](#)

Stock Price (The data is of Opening market price and/or Closing Market Price. Kindly visit Stock Exchange websites to check real-time prices)

FSL
FIRSTSOURCE SOLUTIONS LTD. • Market Closed

199.50 ^E -1.60 (-0.80%)

1M 3M 1Y 5Y All

My Actionable

1. Declaration required - 23/09/2021 (Valid Till - 14/09/2021) (PLEASE KEEP THE FOLLOWING DETAILS HANDY FOR FILLING UP THE FORM.- PAN, SPOUSE'S PAN, DEMAT ACCOUNT DETAILS AND NUMBER OF SHARES HELD IN

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

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

My Pre Clearance Request Actionable

Trade Request

All Requested	Pending	Approved	Rejected
0	0	0	0

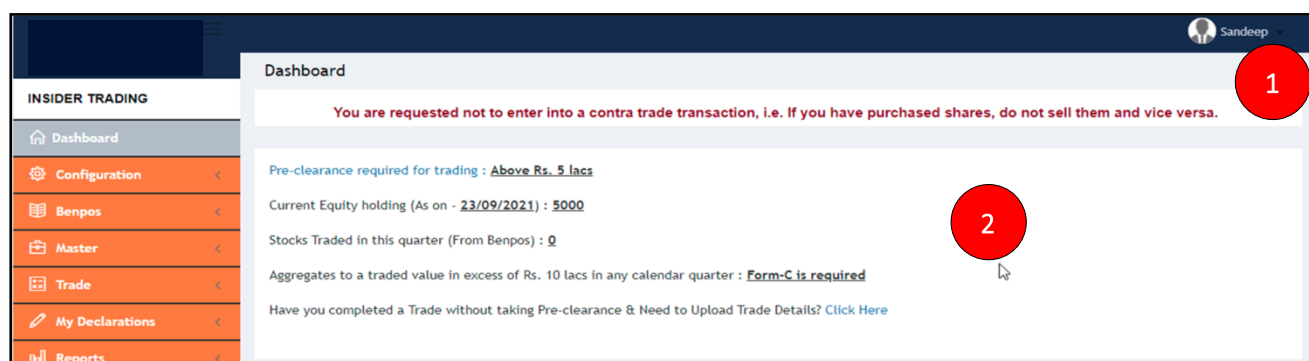
My Trade Details

Submitted With Clearance	Submitted Without Clearance	Not Declared
0	0	0

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

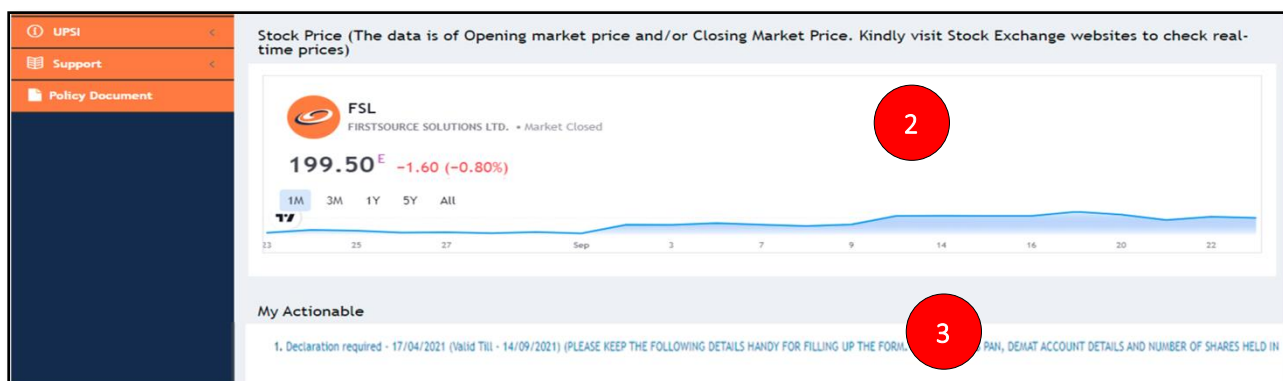
Specific and important details regarding the organizational PIT compliances are provided in this section as shown in screenshot above. These are guiding rules for the user to trade and seek pre-clearance approvals. Details are provided as-

- 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 in 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](#)

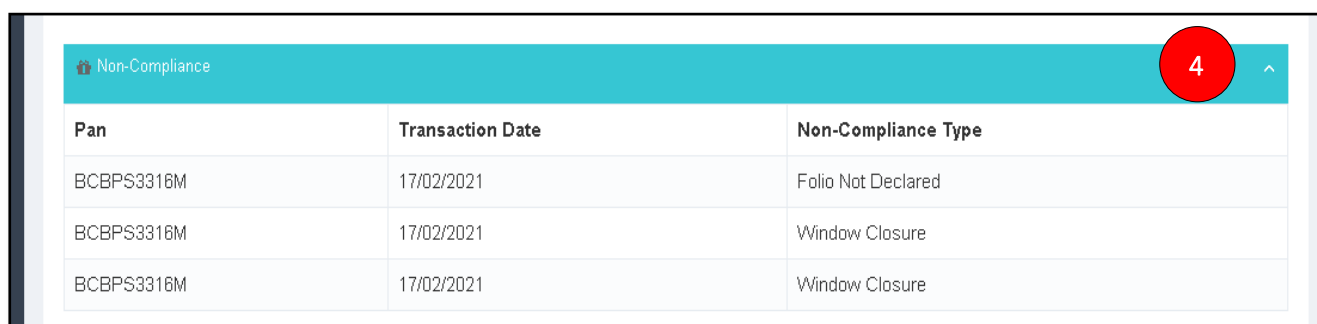
b. Training Submission Actionable

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		
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: -

- 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”
- Window Closure** – The Designated Person has made a Trade inside Trading window closure
- Exceeded Trade Limit** – The Designated Person has made a Trade above the Threshold limit without taking Pre-Clearance request from Compliance Officer
- 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.***

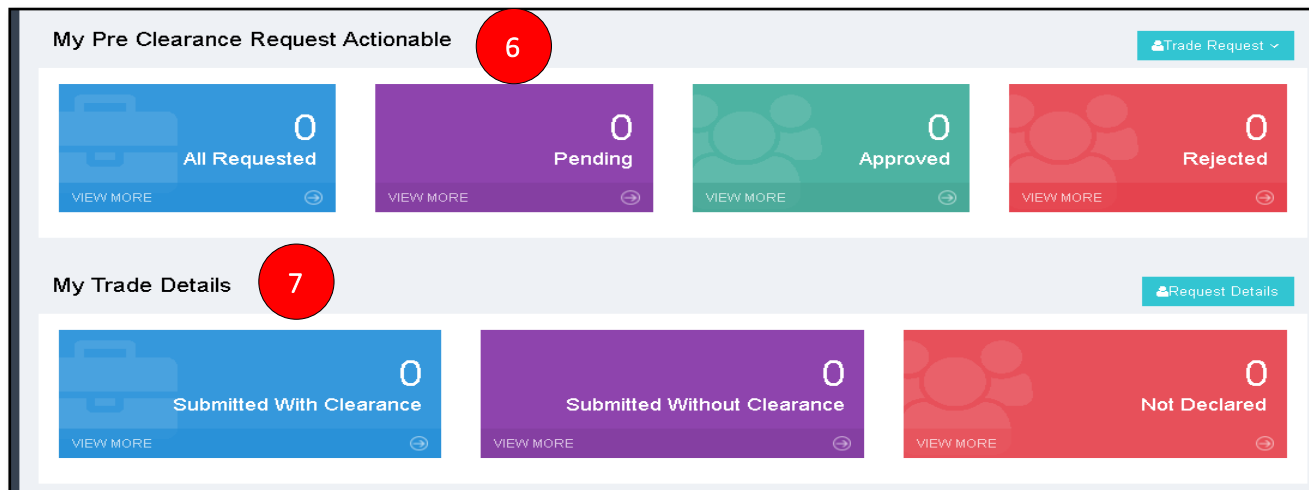
In case Designated Person(s) share some UPSI related matter to a connected person who is not reported or registered in the compliance app, then the application will treat this connected person email id as a non-compliance and report this on the user dashboard as shown below-

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						
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 –

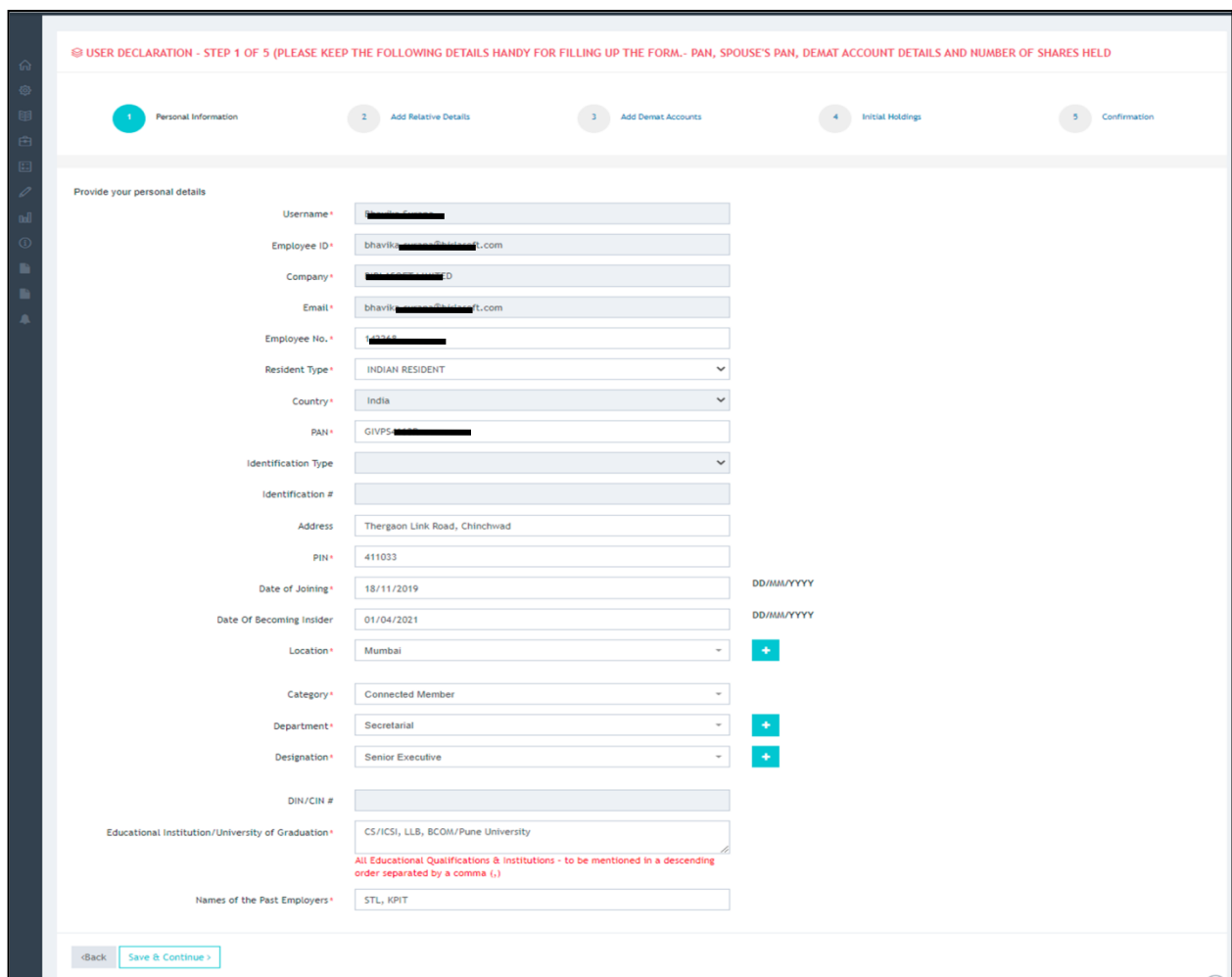
1. **Submitted with Clearance** – The Trades above trading limit done after seeking pre-clearance from Compliance Officer and uploading Broker Notes.
2. **Submitted without Clearance** - The Trades above trading limit done without seeking pre-clearance from Compliance Officer but the Broker Notes are 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 –



The screenshot shows the 'USER DECLARATION - STEP 1 OF 5' form. The form is titled 'Provide your personal details' and includes the following fields:

- Username *
- Employee ID *
- Company *
- Email *
- Employee No. *
- Resident Type *
- Country *
- PAN *
- Identification Type *
- Identification # *
- Address *
- PIN *
- Date of Joining *
- Date Of Becoming Insider *
- Location *
- Category *
- Department *
- Designation *
- DIN/CIN # *
- Educational Institution/University of Graduation *
- Names of the Past Employers *

The form also includes a 'Save & Continue' button and a 'Back' button. The form is divided into five steps: 1. Personal Information, 2. Add Relative Details, 3. Add Demat Accounts, 4. Initial Holdings, and 5. Confirmation.

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

USER DECLARATION - STEP 2 OF 5

1 Personal Information **2 Add Relative Details** 3 Add Demat Accounts 4 Initial Holdings 5 Confirmation

Please provide dependent relative detail. Material financial relationship information if you have provided more than 25% of your Annual Income to any Individual.

+Add

RELATIVE	RELATION	Email	PAN	IDENTIFICATION	ID #	PHONE #	STATUS	ACTION
Jasmeet	Sister		BCBPS3316M				ACTIVE	

Note: "Immediate Relative" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities. It is hereby clarified that a spouse is presumed to be an Immediate Relative, unless rebutted and is mandatorily covered.

Note: "Material Financial Relationship" shall mean a relationship as relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of annual income of such Designated Person, but shall exclude relationships in which the payment is based on arm's length transactions.

[<Back](#) [Save & Continue >](#)

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

Relative Detail

Relation *

Name *

Email

Please check here in case PAN number of Relative is not available ☐

PAN *

Identification Type

Identification Number

Same Address As Yours ☒

Address

Phone

Relationship Status *

Remarks

[Close](#) [Add](#)

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

TRANSACTION SCREEN - STEP 3 OF 5

1 Personal Information 2 Add Relative Details **3 Add Demat Accounts** 4 Initial Holdings 5 Confirmation

Provide your DEMAT Account Details (ALL DEMAT ACCOUNTS REQUIRED)

+Add

FOR	DEPOSITORY	CLIENT ID	PARTICIPANT	PARTICIPANT ID	TRADING MEMBER ID	DEMAT	STATUS	ACTION
Lalitha	CDSL	87654321	Kotak	15425369	NA	1542536987654321	ACTIVE	Edit
Self	NSDL	87654321	Icici	IN123456	NA	IN12345687654321	ACTIVE	Edit
Self	CDSL	87654321	Kotak	12345678	NA	1234567887654321	ACTIVE	Edit

[< Back](#) [Save & Continue >](#)

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

Demat Detail

Demat Account Details For *

Depository Name *

Depository Participant Name

Client Id *

Demat Account Number *

Trading MemberId

Status *

[Close](#) [Add](#)

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

USER DECLARATION - STEP 4 OF 5

1 Personal Information 2 Add Relative Details 3 Add Demat Accounts **4 Initial Holdings** 5 Confirmation

Add Initial Holding Declaration

+Add **+Add Physical**

Holdings in Equity

COMPANY	SECURITY TYPE	FOR	DEMAT ACCOUNT NO	NUMBER OF SECURITIES	ACTION
Birlasoft Limited	Equity	Self	IN30429571482808	100	
Birlasoft Limited	Equity	Jaimeetkaur Sial	IN30177419018867	100	

Holdings in Physical

COMPANY	FOR	Quantity	ACTION
Birlasoft Limited	Self	199	

[<Back](#) [Save & Continue >](#)

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

Initial Holding Declaration

Company * Demo Corporation Limited

Security Type * Equity

For * Aishwarya Rai

PAN AHJPN6777H

Demat Account No 1253446718364543

Trading MemberId Id 91735373535

Number Of Securities * 2500

[Close](#) [Add](#)

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

USER DECLARATION - STEP 5 OF 5

1 Personal Information 2 Add Relative Details 3 Add Demat Accounts 4 Initial Holdings 5 Confirmation

Send Initial Holding

You are about to submit your final disclosure. Please review the details below and accept the Insider Trading Code for submission.

Mail To	Compliance Officer
Mail From	Shruti Sharma
Subject	Declaration under the Insider Trading Code

Body

For	Company	Security Type	Demat Account No	Number Of Securities
Self	Birlasoft Limited	Equity	IN30429571482808	100
Jasmeet	Birlasoft Limited	Equity	IN30177419018867	
Self	Birlasoft Limited	Physical	N/A	

Policy Document

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vii. "Connected person" means

- any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including:
 - by reason of frequent communication with its officers; or
 - by being in any contractual, fiduciary or employment relationship; or
 - by being a director, officer or an employee of the Company; or
 - by holding any position including a professional or business relationship between himself and the Company whether temporary or permanent that allows such person, directly or indirectly, access to UPSI (as defined below) or is reasonably expected to allow such access.
- Further, the following persons shall be deemed to be "Connected Persons" unless the contrary is established:
 - an immediate relative of Connected Person; or
 - holding company or associate company or subsidiary company; or
 - an intermediary as specified in Section 12 of the SEBI Act or an employee or director thereof; or
 - an investment company, trustee company, asset management company or an employee or director thereof; or
 - an official of a stock exchange or of clearing house or corporation; or
 - a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund, or is an employee thereof; or
 - a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - an official or an employee of a self-regulatory organization recognised or authorized by SEBI; or
 - a banker of the Company; or
 - a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest.

I, the undersigned, being a Designated Person as defined under the Code to Regulate, Monitor and Report Trading by Designated Persons in Securities of Birlasoft Limited (the "Code"), hereby declare and confirm as under:

- I have received, read and understood the Code.
- I agree to comply with Code and that I and my Immediate Relatives shall be bound by the Code to the extent applicable to us;
- I agree to hold the Company harmless in the event of any investigation against me and / or my Immediate Relatives for any insider trading by the regulatory agencies;
- I agree to compensate the Company for all economic losses, loss / damage to the Company's public image, fines imposed on the Company, any penalty imposed on the Company, suffered in or as a result of any investigation by regulatory agencies into my or my Immediate Relatives Trades;
- I agree to compensate the Company for all legal expenses incurred in defending itself in such investigations
- In case of any change in the information, I will provide the same to the Company as soon as possible

☒ I hereby declare that I accept the terms & conditions of this Code.

[<Back](#) [Submit Your Declaration ✓](#)

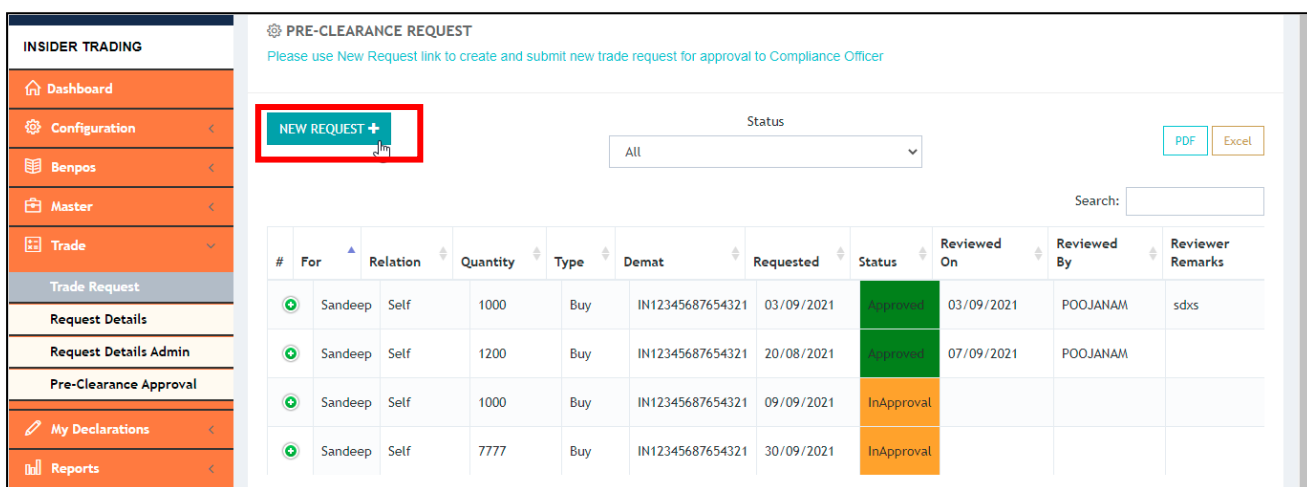
- Before Final Declaration Submission, Verify the Holding details against the DEMAT Accounts provided
- To provide a final confirmation of your declaration, it is pivotal to first read and confirm on the Insider Trading code of conduct policy as provided by your organization. Please read the PDF document before proceeding further
- 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.
- 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

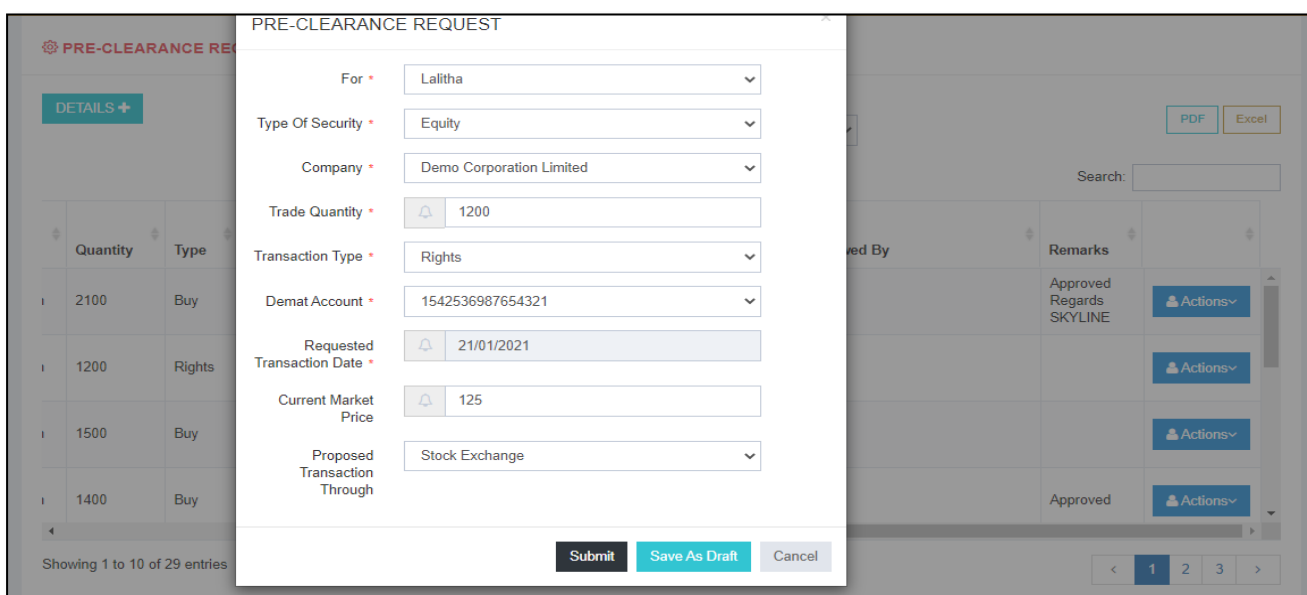
In order to take a pre-clearance request for trading, Users can create a request from the “Trade Request” Masters as shown in the image below. The Link is provided under the ‘Trade’ Menu Masters or ‘Trade Request’ icon on Dashboard.



#	For	Relation	Quantity	Type	Demat	Requested	Status	Reviewed On	Reviewed By	Reviewer Remarks
1	Sandeep	Self	1000	Buy	IN12345687654321	03/09/2021	Approved	03/09/2021	POOJANAM	sdxs
2	Sandeep	Self	1200	Buy	IN12345687654321	20/08/2021	Approved	07/09/2021	POOJANAM	
3	Sandeep	Self	1000	Buy	IN12345687654321	09/09/2021	InApproval			
4	Sandeep	Self	7777	Buy	IN12345687654321	30/09/2021	InApproval			

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



PRE-CLEARANCE REQUEST

For * Lalitha

Type Of Security * Equity

Company * Demo Corporation Limited

Trade Quantity * 1200

Transaction Type * Rights

Demat Account * 1542536987654321

Requested Transaction Date * 21/01/2021

Current Market Price 125

Proposed Transaction Through Stock Exchange

Submit Save As Draft Cancel

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 Form –G & Undertaking Form-H

PRE-CLEARANCE REQUEST

DETAILS +

Status: All

PDF Excel

Search:

Quantity	Type	Demat	Requested	Status	Broker Note Uploaded	Reviewed On	Reviewed By	Remarks
1500	Buy	1542536987654321	25/12/2020	InApproval	N		nitin	
1400	Buy	1234567887654321	30/10/2020	Approved	Y	20/10/2020	nitin	A
1501	Buy	IN12345687654321	28/10/2020	Approved	Y	21/10/2020	nitin	Approved for TTK demo
1600	Buy	1234567887654321	26/10/2020	Approved	Y	22/10/2020	nitin	Approved for RPSG Demo Regards

Actions Edit Download Trade Files

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 is approved, you will be 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.

PRE-CLEARANCE REQUEST

DETAILS +

Status: All

PDF Excel

Search:

Quantity	Type	Demat	Requested	Status	Broker Note Uploaded	Reviewed On	Reviewed By	Remarks
1500	Buy	1542536987654321	25/12/2020	InApproval	N		nitin	
1400	Buy	1234567887654321	30/10/2020	Approved	Y	20/10/2020	nitin	A
1501	Buy	IN12345687654321	28/10/2020	Approved	Y	21/10/2020	nitin	Approved for TTK demo
1600	Buy	1234567887654321	26/10/2020	Approved	Y	22/10/2020	nitin	Approved for RPSG Demo Regards

Actions Edit Download Trade Files

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

Note A

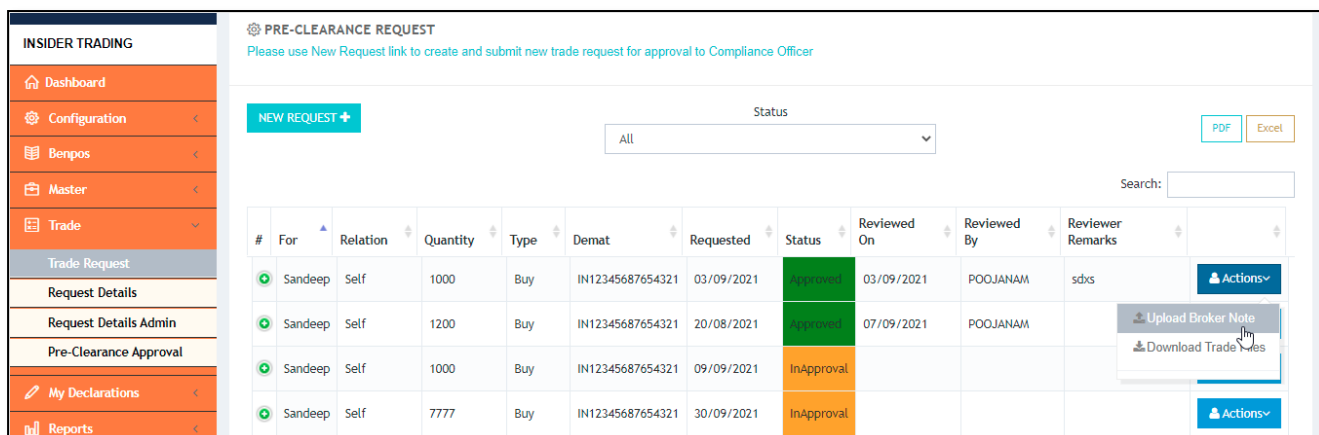
1. The requests that are In-Approval stage can only be withdrawn
2. On Request Withdrawal, Users can re-enter the details and re-submit their request for approval
3. The Requests cannot be edited once approved
4. The Status for Approved or rejected approval requests will change accordingly in the listing

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.

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.



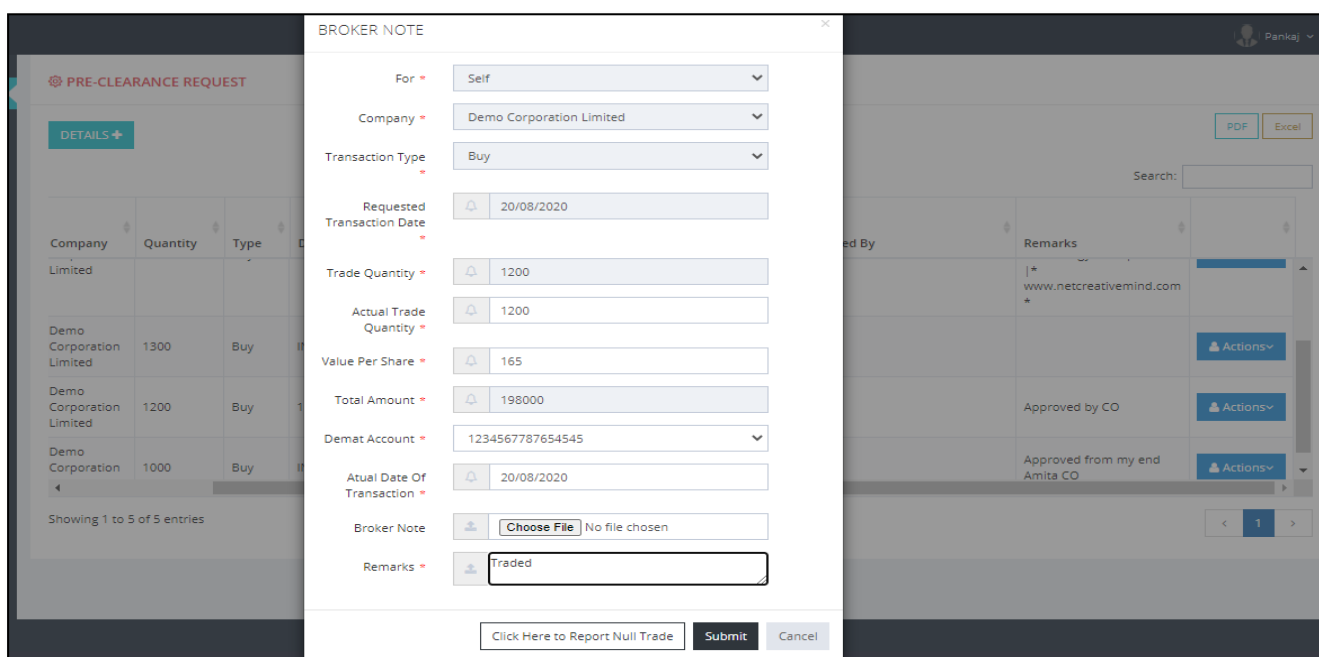
PRE-CLEARANCE REQUEST
Please use New Request link to create and submit new trade request for approval to Compliance Officer

[NEW REQUEST +](#) Status: All [PDF](#) [Excel](#)

Search:

#	For	Relation	Quantity	Type	Demat	Requested	Status	Reviewed On	Reviewed By	Reviewer Remarks	Actions
1	Sandeep	Self	1000	Buy	IN12345687654321	03/09/2021	Approved	03/09/2021	POOJANAM	sdxs	Actions
2	Sandeep	Self	1200	Buy	IN12345687654321	20/08/2021	Approved	07/09/2021	POOJANAM		Upload Broker Note Download Trade Notes
3	Sandeep	Self	1000	Buy	IN12345687654321	09/09/2021	InApproval				Actions
4	Sandeep	Self	7777	Buy	IN12345687654321	30/09/2021	InApproval				Actions

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



BROKER NOTE

For: Self

Company: Demo Corporation Limited

Transaction Type: Buy

Requested Transaction Date: 20/08/2020

Trade Quantity: 1200

Actual Trade Quantity: 1200

Value Per Share: 165

Total Amount: 198000

Demat Account: 1234567787654545

Actual Date Of Transaction: 20/08/2020

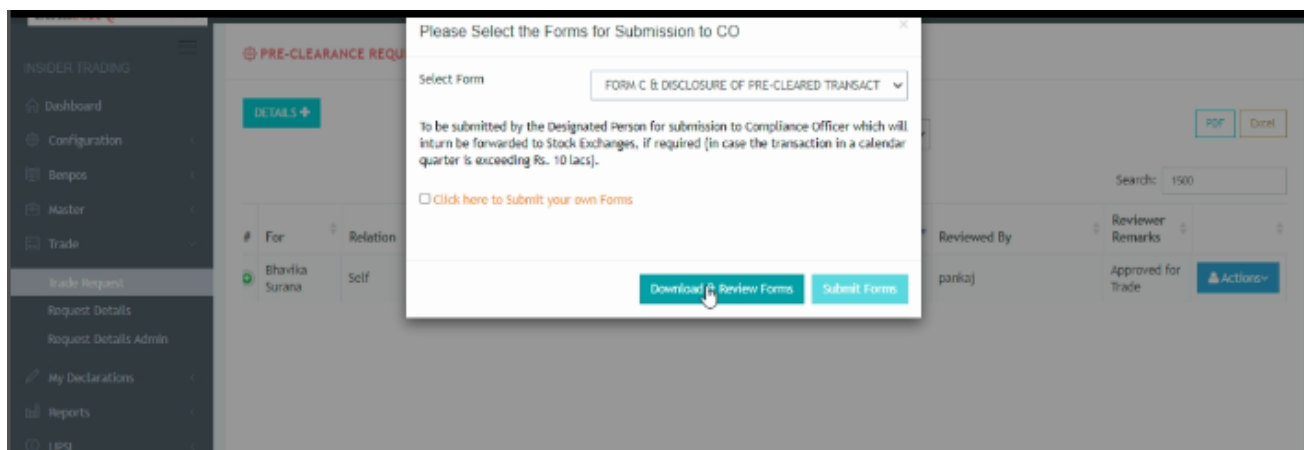
Broker Note: Choose File No file chosen

Remarks: Traded

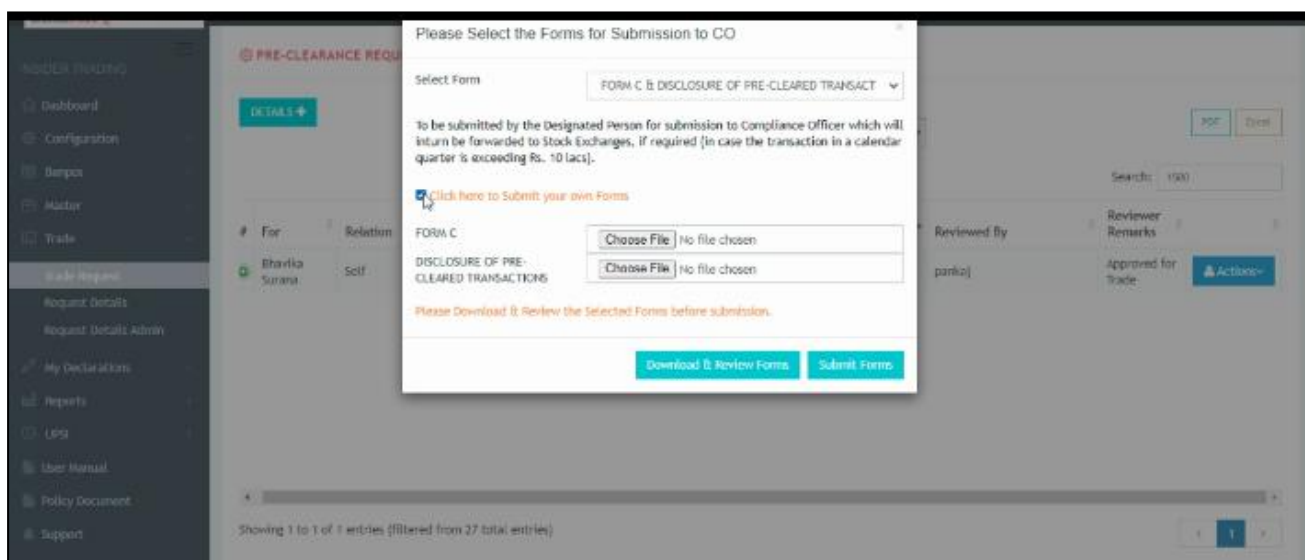
[Click Here to Report Null Trade](#) [Submit](#) [Cancel](#)

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-

PRE-CLEARANCE REQUEST

DETAILS +

Status

tatus

All

PDF

Excel

Search:

#	For	Security	Company	Quantity	Type	Demat	Requested	Status	Reviewed On	Reviewed By	Reviewer Remarks																						
1	Self	Equity	BIRLASOFT Limited	6000	Buy	1979812312345670	05/03/2021	Approved	04/03/2021		Approved	Actions																					
<table><tr><th>Trade Quantity</th><th>Value Per Share</th><th>Total Amount</th><th>Actual Transaction Date</th><th>Remarks</th><th>Broker Note</th><th></th></tr><tr><td>2000</td><td>380</td><td>760000</td><td>03/03/2021</td><td>Test</td><td></td><td>Actions</td></tr><tr><td>1997</td><td>490</td><td>978530</td><td>02/03/2021</td><td>test</td><td></td><td>Actions</td></tr></table>													Trade Quantity	Value Per Share	Total Amount	Actual Transaction Date	Remarks	Broker Note		2000	380	760000	03/03/2021	Test		Actions	1997	490	978530	02/03/2021	test		Actions
Trade Quantity	Value Per Share	Total Amount	Actual Transaction Date	Remarks	Broker Note																												
2000	380	760000	03/03/2021	Test		Actions																											
1997	490	978530	02/03/2021	test		Actions																											
	Self	Equity	BIRLASOFT Limited	6000	Buy	1979812312345670	05/03/2021	Draft				Actions																					

Showing 1 to 2 of 2 entries

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-

PRE-CLEARANCE REQUEST

DETAILS +

Status

All

PDF

Excel

Search:

Company	Quantity	Type	Demat	Requested	Status	Reviewed On	Reviewed By	Reviewer Remarks	
BIRLASOFT Limited	6000	Buy	1979812312345670	05/03/2021	Approved	04/03/2021		Approved	Actions

Value Per Share	Total Amount	Actual Transaction Date	Remarks	Broker Note	
380	760000	03/03/2021	Test		Actions
490	978530	02/03/2021	test		Download Form

BIRLASOFT Limited	6000	Buy	1979812312345670	05/03/2021	Draft				Actions
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Showing 1 to 2 of 2 entries

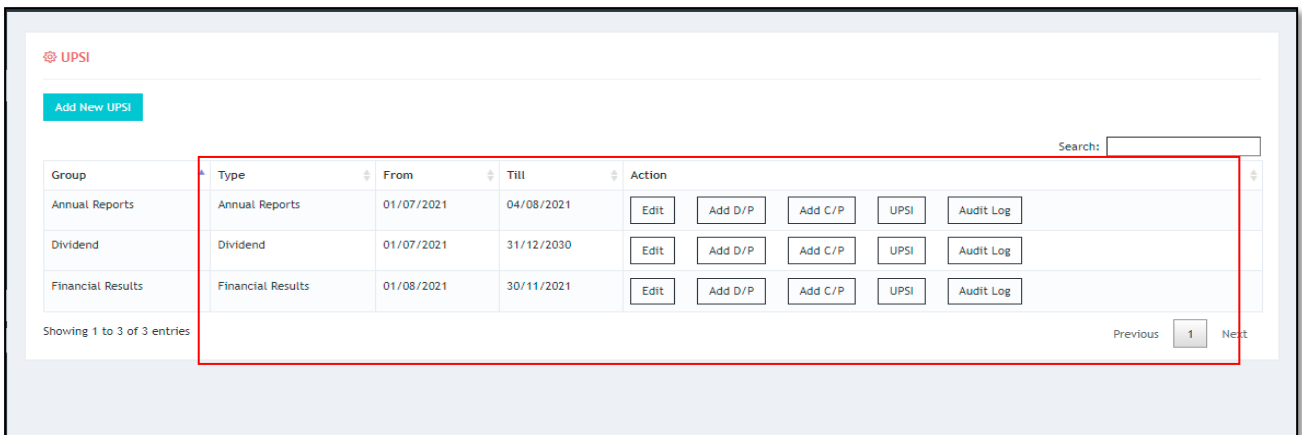
04. UPSI Digital Database and Group Info

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

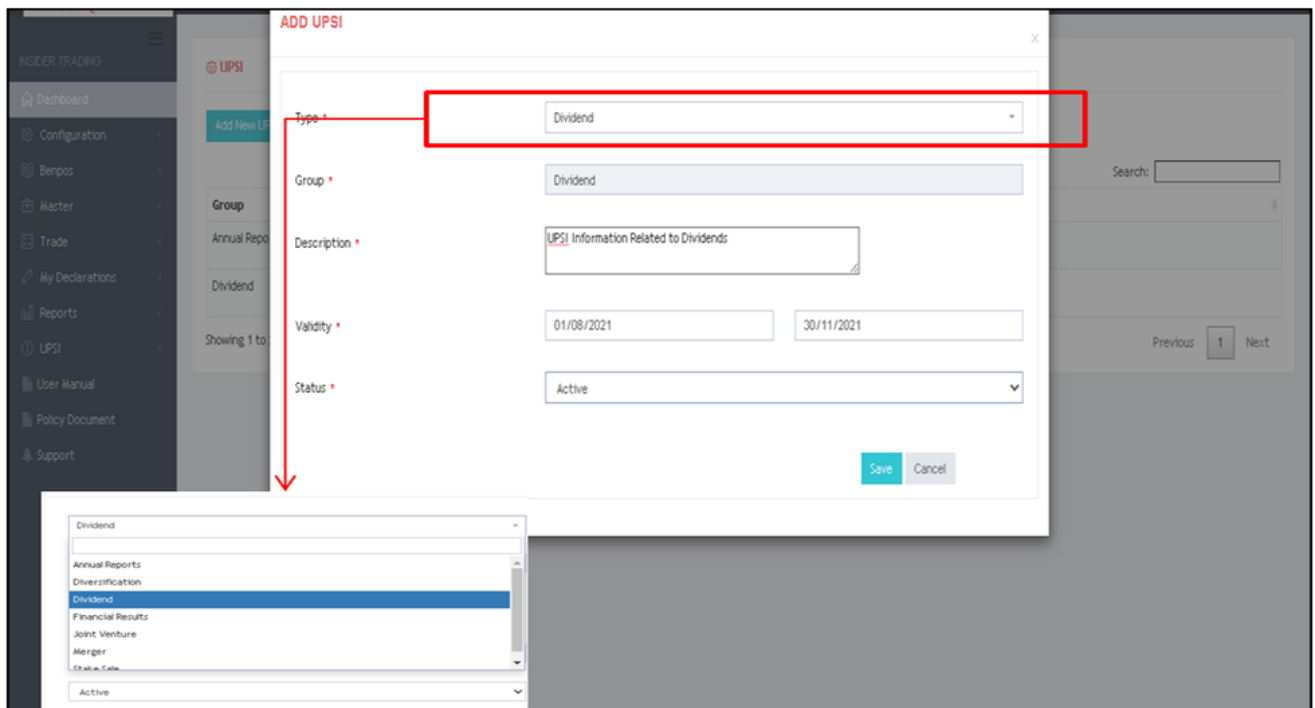


Group	Type	From	Till	Action
Annual Reports	Annual Reports	01/07/2021	04/08/2021	Edit Add D/P Add C/P UPSI Audit Log
Dividend	Dividend	01/07/2021	31/12/2030	Edit Add D/P Add C/P UPSI Audit Log
Financial Results	Financial Results	01/08/2021	30/11/2021	Edit Add D/P Add C/P UPSI Audit Log

Showing 1 to 3 of 3 entries

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)



ADD UPSI

Type: Dividend

Group: Dividend

Description: UPSI Information Related to Dividends

Validity: 01/08/2021 30/11/2021

Status: Active

Save Cancel

Dividend

Annual Reports

Diversification

Dividend

Financial Results

Joint Venture

Merger

Strategic Sale

Active

UPSI Group Key Details include

- UPSI Type (EG: Financial Info, Audit, Merger, Acquisition, Investment etc.)
- Validity (Group valid from and to dates)
- Status (Whether 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

The screenshot shows the UPSI management interface. At the top left is a button 'Add New UPSI'. Below it is a table with the following columns: Group, Type, From, Till, and Action. The table contains three entries: 'Annual Reports', 'Dividend', and 'Financial Results'. The 'Financial Results' row is highlighted, and the 'Add D/P' button in the Action column is highlighted with a red box. A red arrow points from this button to the 'UPSIED' section below the table. The table also includes buttons for 'Edit', 'Add C/P', 'UPSIED', and 'Audit Log' for each row. At the bottom, it says 'Showing 1 to 3 of 3 entries' and has 'Previous' and 'Next' navigation buttons.

Group	Type	From	Till	Action
Annual Reports	Annual Reports	01/07/2021	04/08/2021	Edit Add D/P Add C/P UPSIED Audit Log
Dividend	Dividend	01/07/2021	31/12/2030	Edit Add D/P Add C/P UPSIED Audit Log
Financial Results	Financial Results	01/08/2021	30/11/2021	Edit Add D/P Add C/P UPSIED Audit Log

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

The screenshot shows the UPSI management interface with the 'UPSIED CONNECTED PERSON(S)' section open. The 'Add C/P' button in the 'Financial Results' row of the table above is highlighted with a red box, and a red arrow points from it to the 'UPSIED CONNECTED PERSON(S)' section. This section contains a form for adding connected persons. It has fields for Name, Email, Identification, and Identification #. Below the form is a table listing existing connected persons: Bhavika, Pankaj Singh, and Pankaj Singh. At the bottom, there are 'Save Connected Person(s)' and 'Cancel' buttons.

Name	Email	Identification	Identification #
Bhavika	csbhavikasurana@gmail.com	PAN	AIGH6514R
Pankaj Singh	pankaj.singh@pro-cs.in	PAN	AIGN4533R

e. Adding UPSI Information

Use Add UPSI button to add UPSI Information sharing log

The screenshot shows a 'UPSII COMMUNICATION' form with the following fields:

- Dividend**
- UPSII Shared With (Connected Person)***: Pankaj Singh (pankaj.singh@pro-cs.in)
- UPSII Shared With (Designated Person)***: Bhavika Surana (bhavika.surana@birlasoft.com)
- UPSII Shared On***: 12/08/2021, 13:40
- Mode of Sharing UPSII***: Email
- Attachment (if any)**: Choose File | No file chosen
- Remarks**: Un-Audited Financial Information shared with Pankaj
- Buttons**: Save, Cancel

To the right, a sidebar menu shows buttons for 'Add C/P', 'UPSII', and 'Audit Log'. The 'UPSII' button is highlighted with a red box and a red arrow pointing to it.

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

AUDIT LOG											
Group											
Designated Members											
Connected Person											
UPSII											
No.	Action	From	To	CC	Bcc	Message	Mode	Comm. Date	Created By	Desc	
1	Added	bhavika.surana@birlasoft.com	chirag@nggroup.com			Client has shared the UPSII details	Email	7/1/2021 4:35:00 PM	bhavika.surana@birlasoft.com		
2	Added	bhavika.surana@birlasoft.com	bhavika.surana@birlasoft.com			Client has shared the UPSII details	Email	7/1/2021 4:35:00 PM	bhavika.surana@birlasoft.com		
3	Added	bhavika.surana@birlasoft.com	pankaj.singh@pro-cs.in			Client has shared the UPSII details	Email	7/1/2021 4:35:00 PM	bhavika.surana@birlasoft.com		
4	Added	bhavika.surana@birlasoft.com	pramod1.gandhi@birlasoft.com			Client has shared the UPSII details	Email	7/1/2021 4:35:00 PM	bhavika.surana@birlasoft.com		
5	Added	bhavika.surana@birlasoft.com	pulkit@pro-cs.in			<p>Classification: Internal</p> <p>Hi Sandeep</p> <p>This again is not the correct format. Will discuss on this about this. Thanks</p> <p>Regards Bhavika</p> <p>--- Bhavika Surana Executive - Secretarial Phone: 8446387081</p>	Email	7/16/2021 8:58:00 AM	bhavika.surana@birlasoft.com		

05. UPSI Email based Reporting

Since Providing UPSI information by coming to system every now and then can be a bit 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	Insiderco@pro-cs.in;	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

UPS GROUP TASK

Email *	Name *	Identification *	Identification # *	Company Name
Varsha.Aswani@birlacable.com	Varsha Aswani	PAN	BTPPA4299E	
Sneha.Padve@birlacable.com	Sneha Padve		Enter Identification #	
secretaria@birlacable.com	Enter Connected Person		Enter Identification #	
UPSI@birlacable.com	Super Admin		Enter Identification #	

Save

Cancel