

INNOVATE SECURITIES PVT. LTD.

1ST Floor " Devashish, 39, Sardar Patel Nagar, Nr. Nest Hotel, Navrangpura, Ahmedabad – 380 006.
Ph – 079-26474500, 26421314-26421315 (M) 9825032652, Email : innovate95@rediffmail.com,
www.innovatesec.com

Code of Conduct

The prime purpose of the Code of Conduct is to create an environment where all the Board Members, Senior Management and staff at all levels of the Company maintain ethical standards and comply with the laid down systems and procedures.

1. Honest And Ethical Conduct :

Board Members and Senior Management of the Company shall act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct and their conduct is expected to be in the best interest of the Company.

2. ConflictsOfInterest :

The Board Members & Senior Management of the Company shall not enter into any transaction or engage in any practice, directly or indirectly, that would tend to influence him or her to act in any manner other than in the best interest of the Company.

3. CorporateOpportunities :

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Board Members and Senior Management of the Company shall refrain from:

- (a) Using for themselves personally, opportunities discovered through the use of Company's property, information or position,
- (b) Engaging in any activity which competes directly with the business of the Company or with any business that the Company is considering.
- (c) Using Company's property, information or position for personal gain.

4. Confidentiality :

Board Members and Senior Management of the Company shall maintain confidentiality of information entrusted to them by the Company or its customers, suppliers and business associates except when authorized or legally mandatory.

5. ProperuseofCompanyAssets :

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While using the assets/money or any property of the Company, the Board Members and Senior Management of the Company shall be quite prudent and use them only for legitimate business purpose of the Company.

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6. Commitments to set up New Bench-Marks for Improvement of Performance :

Board members and Senior Management of the Company shall remain committed towards setting up of new bench-marks of performance with an aim to further improve overall performance of the Company in terms of profitability and such other criteria of enhancing shareholders' value to the Company.

7. Systems Oriented approach and compliance with Systems and Procedures of the Company

Board members and Senior Management of the Company are expected to adopt a system oriented approach for the business of the Company. They shall ensure due compliance of the systems and procedures specifically laid down by the Company and wherever such systems and procedures have not been so laid down, in such cases also the persons concerned will adopt a reasonable operative system and procedure so as to fully safeguard the interest of the Company.

8.CompliancewiththeLaws,RulesandRegulations :

Board members and Senior Management of the Company must comply with all applicable governmental laws, rules and regulations. They must acquire appropriate knowledge of the legal requirements relating to their duties sufficient to enable them to recognize potential dangers, and to know when to seek advice from the legal department. Violations of applicable governmental laws, rules and regulations may subject them to individual criminal or civil liability, as well as to disciplinary action by the Company. Such individual violations may also subject the Company to civil or criminal liability or the loss of business.

9.CompliancewithCodeOfConduct

The Board Members and Senior Management of the Company are expected to comply with this Code of Conduct in its letter and spirit. Non-compliance will make individual out-caste from value system and also attract disciplinary action as may be decided by the Board.

10. Employees / Staff

- Employees/temporary staff/voluntary workers etc. employed/working in the offices of market intermediaries do not encourage or circulate rumours or unverified information obtained from client, industry, any trade or any other sources without verification.

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- Access to social media platforms/ instant messaging services/ VoIP / Blogs/Chat forums/websites/e-mail or any such medium should either be subject to controlled supervision or access should not be allowed.
- Logs for any usage of such social media platforms/ instant messaging services/ VoIP / Blogs/Chat forums/websites/e-mail or any such medium shall be treated as records and the same should be maintained as specified by the respective regulations which govern the concerned intermediary.
- Employees should be directed that any market related news received by them either in their official mail/personal mail/blog or in any other manner, should be forwarded only after the same has been seen and approved by the Compliance Officer of the concerned Intermediaries. If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act and the Rules / Regulations framed thereunder, and shall be liable for action. The Compliance Officer shall also be held liable for breach of duty in this regard