

Policy for Dealing with Conflict of Interest for Investment / Trading

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This policy establishes the procedures governing trading and investment activities for ESGRisk.ai and its employees. Its purpose is to ensure strict adherence to regulatory requirements, including:

- The Securities and Exchange Board of India (Insider Trading) Regulations, 2015
- The Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003
- All other applicable securities trading laws
 1. ESGRisk.ai and its employees are strictly prohibited from buying or selling any equities listed on Indian stock markets.
 2. Within seven working days of joining, every employee holding any equity investments must submit a Holding Statement. This statement should detail all securities held by the employee, as well as those held by immediate family members and dependents, and must be submitted to the Compliance Officer.
 3. Employees must obtain prior approval from the Compliance Officer before selling any existing equity investments. Approval requests must be submitted through the STAMP portal. The Compliance Officer's decision, communicated via the STAMP portal, will be valid for a period of seven calendar days.
 4. Investments in Gold, Real Estate, Mutual Funds, and Index Funds are permitted without prior approval.
 5. For investments in unlisted companies, employees are required to secure written permission from the Company Secretary in advance.

This policy will be reviewed periodically and updated as necessary to ensure continued compliance with regulatory requirements and to address evolving business needs.