



VATSA CAPITAL VENTURE PRIVATE LIMITED



INVESTMENT POLICY FOR EMPLOYEES AND MANAGEMENT

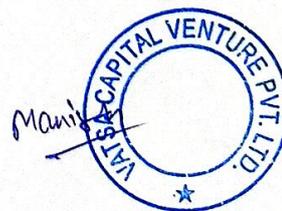
- (i) The document has been prepared in accordance with the Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992, as amended from time to time as per the requirement.
- (ii) The purpose of the Document is to provide essential information about the company in a manner to assist and enable the investors/clients in making an informed decision for engaging the company.
- (iii) The document contains necessary information about the company required by an investors/client before availing services, and the investors/clients may also be advised to retain the document for future reference.
- (iv) This Document is dated 27-02-2026

Details of the Company

Name of Merchant Banker	Vatsa Capital Venture Private Limited
Registered Office Address	4-C/6, 2 nd Floor, New Rohtak Road, Karol Bagh, New Delhi-110005
Phone No(s)	01140456969
E-mail address	info@vatsacapitalventure.com
Website	https://vatsacapitalventure.com/

Details of the Compliance Officer

Name of Compliance Officer	CS Manish
E-mail Address	investors.grievances@vatsacapitalventure.com



INVESTMENT POLICY FOR EMPLOYEES AND MANAGEMENT

1. This Code of Investment ("the Code") shall be called 'Investment Policy for Employees and Management of 'Vatsa Capital Venture Private Limited ' (hereinafter referred to as "the Company")
2. The Code has been framed in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015 which stipulates that all employees and management of merchant banking company shall maintain confidentiality of Unpublished Price Sensitive Information and shall not share the said information with anyone and not use such information directly or indirectly for personal gains in any manner.
3. The term "Management" shall mean personnel of the Company who are Key Managerial Personnel, Compliance Officer and all directors of the company. Normally, this would comprise of all members of management one level below the executive directors, including all functional heads.
4. The code shall be posted on the website of the Company.
5. The conduct of directors and employees should be in accordance with the articles of association of the Company; but in no case should contravene the duties specified by the law.

APPLICABILITY

The code shall be applicable to Employees of the company and Management of the company.

OBJECTIVE

With a view to maintain high standards of governance, to induce and recognize the virtues of compliance and accountability and to avoid insider trading in all spheres of activities of the organization, the following rules/code is required to be observed. The Company appoints the Compliance Officer as principal officer responsible to maintaining compliance of this code and the compliance officer is responsible to take disciplinary action in case of breach of the code.

TERMS OF POLICY

The Employees and Management Personnel are not permitted to buy, sell, hold or trade in the shares and securities of any clients associated with the company directly or indirectly for perpetuity during their association with their company or after employment.

The Employees and Management Personnel shall maintain confidentiality of Unpublished Price sensitive information and shall not share the said information with anyone and shall not use such information for personal gains in any manner.



DISCLOSURE REQUIREMENTS

The Employees and Management Personnel are required to submit a detailed list of investments held and traded by them on half yearly basis – 30th September and 31st March in format as per Schedule 1 of this Code within 30 days of completion of the half year period. The Employees and Management Personnel are required to submit a declaration that they have maintained confidentiality of Unpublished Price sensitive information and they have not shared the said information with anyone and not use such information for personal gains in any manner. In case any Employee or Management Personnel violates the said policy directly or indirectly, the said employee or managerial personnel shall inform the compliance officer immediately.

BREACH OF POLICY

In case of breach The Directors/Management personnel/Employee shall be personally responsible for the legal ramifications of the violation of law and the company is entitled to take legal action against the such person in manner as the board of directors deems fit.

AMENDMENT/ MODIFICATION/ WAIVER

This code may be amended and modified by the Board of the company from time to time to protect the interests or the Company and subject to the provisions of applicable laws. Regulations or guidelines. As a general policy, the Board will not grant waiver of this code for any breach.

