

**DCM NOUVELLE LIMITED**  
**CIN: L17309DL2016PLC307204**  
**Regd Off: 407, Vikrant Tower,04, Rajendra place,**  
**New Delhi-110008**

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY  
DESIGNATED PERSONS**

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## 1. INTRODUCTION

- 1.1. Regulation 9(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**Regulations**") requires the Board of Directors of every listed company to ensure that the Chief Executive Officer or Managing Director shall formulate a code of conduct with their approval to regulate, monitor and report trading by its Designated Persons and their immediate relatives towards achieving compliance with the Regulations, adopting the minimum standards set out in Schedule B to the Regulations, without diluting the provisions of the Regulations in any manner.
- 1.2. The Board of Directors of the Company has accordingly approved and adopted this Code of Conduct to regulate, monitor and report trading by designated persons ("**Code of Conduct**").
- 1.3. The Designated Persons and their immediate relatives shall be governed by this Code of Conduct.
- 1.4. This Code, along with the amendments made thereto, shall come into force with immediate effect.

## 2. DEFINITIONS

- (a) "**Act**" means the Securities and Exchange Board of India Act, 1992
- (b) "**Audit Committee**" shall mean Committee of the Board of the Company constituted pursuant to Section 177 of the Companies Act, 2013 read with Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.
- (c) "**Board**" means the Board of Directors of the Company.
- (d) "**Code**" means this code of conduct to regulate, monitor and report trading by designated persons in Securities of DCM Nouvelle Limited including modifications made thereto from time-to- time by the Company.
- (e) "**Company**" means DCM Nouvelle Limited or DCMNVL

(f) **"Compliance Officer"**. means the Company Secretary and in his absence the Chief Financial officer of the Company, designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the Rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these Regulations under the overall supervision of the Board of Directors of the Company.

(g) **"Connected Person" means:**

- I. any person who is or has during the 6 (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 holds any position including a professional or business relationship between himself/herself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.
- II. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established –
  - (i) an Immediate Relative of connected persons specified above; or
  - (ii) a holding company or associate company or subsidiary company; or
  - (iii) an intermediary as specified in section 12 of the SEBI Act or an employee or director thereof; or
  - (iv) an investment company, trustee company, asset management company or an employee or director thereof; or
  - (v) an official of a stock exchange or of clearing house or corporation; or
  - (vi) 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
  - (vii) 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
  - (viii) an official or an employee of a self-regulatory organization recognized or authorized by SEBI; or
  - (ix) a banker of the Company; or
  - (x) 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.

(h) **"Designated Persons" means:**

- (i) all Key Managerial Personnel;
- (ii) every employee in grade of General Manager and above including functional heads;
- (iii) every employee in accounts finance and secretarial department.;
- (iv) Board of Directors;
- (v) Promoters;
- (vi) Immediate Relatives of persons specified in (i) to (v) above; and
- (vii) All individuals and entities in promoters and promoters group as per shareholding pattern submitted by the Company with Stock Exchanges;
- (viii) Chief Executive Officer and employees upto two levels below Chief Executive Officer of fiduciary (ies).
- (ix) All employees who have access to unpublished price sensitive information are identified as designated person.

(i) **"Financially Literate"** means a person who has the ability to read and understand basic financial statements i.e., balance sheet, profit and loss account and statement of cash flows.

(j) **"Fiduciary"** includes auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks, etc. assisting or advising the Company who are communicated, provided or allowed access to any UPSI, relating to the Company or its securities in furtherance of legitimate purposes.

(k) **"Generally Available Information"** means information that is accessible to the public on non-discriminatory basis.

(l) **"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.

(m) **"Insider"** means any person who is a Connected Person or in possession of or having access to UPSI pursuant to a legitimate purpose or otherwise.

(n) **"Leak of UPSI"** shall refer to such act / circumstance(s) by which an UPSI is made available or becomes available, before its official publication or announcement or formal circulation in public domain and which shall also include any purported attempt thereof.

- (o) "**Legitimate purpose**" shall include sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- (o) "**material financial relationship**" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.
- (p) "**Promoter**" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- (q) "**Promoter Group**" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- (r) "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- (s) "**Trading Window**" means the period during which the Designated Persons could trade in the securities of the Company.
- (t) "**Unpublished Price Sensitive Information**" or "**UPSI**" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
  - (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; and
  - (v) changes in Key Managerial Personnel.

Words and expressions used and not defined in this Code, but defined in the SEBI Act, the Regulations, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in such legislations.

### **3. DUTIES OF THE COMPLIANCE OFFICER**

- 3.1 Under the overall supervision of the Board of Directors, the Compliance Officer, shall be responsible for:
- a. Compliance of policies, procedures, maintenance of records & database, monitoring adherence to the rules for the preservation of UPSI.
  - b. Monitoring of trades.
  - c. The implementation of Code of Conduct and Code of Fair Disclosure of UPSI.
  - d. Reviewing, approving, monitoring and making public disclosure of trading plans presented to him by an insider and seeking express undertaking(s), as may be necessary.
  - e. Maintaining the disclosures made under the Regulations for a minimum period of five years.
  - f. Notifying the stock exchange(s) in compliance with the Regulations.
  - g. Assisting the Board of Directors in specifying the Designated Persons.
  - h. Determining window closure period and timing for re-opening of the trading window.
  - i. Granting pre-clearance of trades and seeking necessary declaration(s).
  - j. Granting relaxation from strict application of restrictions on contra-trade.
- 3.2 The Compliance Officer shall report to the Board of Directors; and provide reports to the Chairman of the Audit Committee of the Company or the Board of Directors on a quarterly basis regarding compliance with the Code. The Compliance Officer shall perform duties and be responsible for such acts as are specified in the Regulations.
- 3.3 In the performance of his duties, the Compliance Officer shall have access to all information and documents relating to the Securities, Employees and Unpublished Price Sensitive Information of the Company. In order to discharge his functions effectively, the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his functions.
- 3.4 The Compliance Officer shall act as the focal point for dealings with SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

### **4. RESTRICTIONS ON COMMUNICATION OF UPSI**

- 4.1 All UPSI shall be handled on a 'need to know' basis and no UPSI shall be communicated or disclosed to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

- 4.2 To prevent any misuse of UPSI, the Company adopts the 'Chinese Wall' policy under which a clear demarcation is made between departments that regularly have access to UPSI and other departments.
- 4.3 A structured digital database shall be maintained by the Compliance Officer, as authorized by the Board of Directors of the Company, containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- 4.4 A structured digital database shall be preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.
- 4.5 All persons or entities, with whom UPSI is shared, shall be brought inside on sensitive transactions and confidentiality agreements shall be signed or notice shall be served to all such persons and entities. They should be made aware of the duties and responsibilities attached to the receipt of inside information, and the liability that attaches to misuse or unwarranted use of such information.
- 4.6 All Persons who are privy to the confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others but not limited to the following safeguards:
- 4.6.1 To keep files containing confidential information secured.
- 4.6.2 To keep computer files with adequate security of login through a password.



## 5. DISCLOSURES

5.1 The persons as per below table shall make disclosures in the prescribed formats relating to holding/trading of securities, including derivatives of the securities, of the Company by them and by their immediate relatives and by any other person for whom such persons take trading decisions.

S. No.	Responsibility	Timeline	Prescribed Form No. (As amended by SEBI from time to time) and Form No.
1.	Every promoter, member of the promoter group, Key Managerial Personnel and the Director as on the date of the Regulations taking effect to	Within 30 (thirty) days of the Regulations taking effect.	Form A*
2.	Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a promoter or member of the promoter group	Within 7 (seven) days of such appointment or becoming a promoter	Form B
3.	Every promoter, member of promoter group, Designated Person and Director acquiring/disposing off securities of the Company, if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Indian rupees ten lakh).	Within 2 (two) trading days of such transaction	Form C
4.	Such Connected Persons, as may be required by the Compliance Officer, if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Indian rupees ten lakh).	Within 2 (two) trading days of such transaction	Form D

\* Omitted by Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2021 (w.e.f. April 26, 2021).

5.2 The disclosure of the incremental transactions after any continual disclosure shall be made when the transactions effected after the prior disclosure crosses the specified threshold.

5.3 The Designated Persons shall disclose preferably in the format prescribed in **Form I** comprising of names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis within a period of 30 days from the closure of financial year and as and when the information changes:

- a) immediate relatives
- b) persons with whom such Designated Person(s) shares a material financial relationship
- c) Phone, mobile numbers which are used by them

In addition, the names of educational institutions from which Designated Persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

The Compliance Officer shall maintain records of all the disclosures under clause 5.1 above for a minimum period of five years. Proforma of the register to be maintained is given in **Form-II**.

## 6. PROCEDURE FOR TRADING IN SECURITIES OF THE COMPANY

### A. TRADING RESTRICTIONS

6.1 All the Designated Persons shall be subject to the trading restrictions as set out below: -

- (a) The securities of the Company shall be dealt with only when the Trading Window is open. No Designated Person of the Company and his/her Immediate Relative(s) and Fiduciary shall deal with the Securities of the Company during the period when the Trading Window is closed.
- (b) The Compliance Officer shall send notice of window closure to the Stock Exchanges and intimate the same to the Designated Person(s) for the information of the Designated Person(s) and their Immediate Relatives and Fiduciary(ies).
- (c) The Trading Window for trading in securities of the Company shall be closed in respect of the following purposes for such period as specified hereunder and shall be opened 48 (forty-eight) hours after the said information becomes Generally Available Information:

(i)	Declaration of financial results (Quarterly, Half-yearly and Annual)	From the end of every quarter till 48 hours after the declaration of financial results by the Board of Directors for each Quarterly, Half-year or Annual financial results.
(ii)	Declaration of dividends (Interim and final)	2 (two) working days prior to the date of Board of Directors meeting at which dividend is recommended.
(iii)	Issue of Securities by way of public / rights / bonus etc.	7 (seven) days prior to the date of Board of Directors meeting at which Securities are issued.
(iv)	Other material events	As may be determined by the Compliance Officer keeping in view that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such Securities to which such Unpublished Price Sensitive Information relates.

- (d) In case of employee stock options, exercise of an option may be allowed when the Trading Window is closed. However, sale of shares allotted on exercise of such of an option shall not be allowed when the Trading Window is closed.
- (e) Trading Window may be closed by the Company during such time in addition to the above period, as may be deemed fit by the Compliance Officer. The Compliance Officer shall determine the time of reopening of the Trading Window taking into account various factors including UPSI becoming Generally Available Information, which in any event shall not be earlier than 48 (forty-eight) hours after the UPSI becomes Generally Available Information.
- (f) The Trading Window norms shall not be applicable for trades carried in accordance with an approved Trading Plan.
- (g) The Compliance Officer shall maintain a register of the periods of Closed Trading Window, wherein he shall record the date of closure and opening of the trading window and the purpose for which trading window is closed. A Performa of the register of periods of closure of Trading Window is given in **Form III**.

- (h) The gap between clearance of accounts by audit committee and Board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

## **B. PRE-CLEARANCE OF TRADES**

### **Applicability:**

- 6.2 Every Designated Persons and their immediate relatives who intend to deal in the Securities of the Company either in their own name or in the name of their immediate relatives, when the trading window is open, shall be subject to preclearance by the Compliance Officer, if the value of the proposed trades is excess of Rs. 10,00,000 (Indian rupees ten lakh) to be traded in series of transactions within seven trading day. However, no Designated Person shall apply for pre-clearance of any proposed trade if such Designated Person is in possession of unpublished price sensitive information even if the trading window is not closed.
- 6.3 Application for pre-clearance shall be made only during Valid Trading Window period. Applications submitted during a period when the Trading Window is closed shall be invalid and will be deemed to have been automatically rejected.
- 6.4 **Procedure for Pre-Clearance of Trades:**
- (a) An application for pre-clearance of trade shall be made to the Compliance Officer in the format attached and marked as **Form-IV** hereto, indicating the estimated number of securities that the Designated Person making such application intends to deal in, the details as to the depository with which he/she has a security account and such other details as may be required by the Compliance Officer in this regard.
  - (b) In case of the Compliance Officer intending to deal in the Securities of the Company beyond the threshold limit specified in sub-clause 6.2 above, the pre-clearance of the Managing Director or in his absence, the Chairman of the Board of Directors, shall be obtained.
  - (c) An undertaking in the format set out in the pre-clearance application stated above at **Form-IV** of this Code, shall be executed in favour of the Company by such persons applying for pre-clearance.
  - (d) The Compliance Officer shall not approve any trade if he/she determines that the Designated Person is in possession of UPSI.
  - (e) The Compliance Officer after being satisfied that the application and undertaking are true and accurate, approve trading by a Designated Person within a period of two trading days from the date of receipt of application. Every

approval letter shall be issued in **Form-V**. Every approval shall be dated and shall be valid for a period of seven trading day from the date of approval.

After securing pre-clearance, once trade is executed or a decision not to trade is taken by the Designated Person or his immediate relative, the Designated Person shall report the trade to the Compliance Officer in the format set out at **Form VI** and also intimate his decision not to trade.

- (f) No pre-clearance shall be necessary for direct subscription, by way of subscription to any rights issue made by the Company and /or for a trade executed as per approved Trading Plan and / or pursuant to exercise of stock options.

#### 6.5 **Validity of Pre-Clearance:**

Upon receiving pre-clearance for trading from the Compliance Officer, the concerned Designated Person shall trade in the securities within a period of 7 (seven) trading days. In the event that trading is not executed within the time limit prescribed above, the concerned Designated Person shall obtain a fresh pre-clearance from the Compliance Officer before executing the trade.

#### 6.6 **Register of Pre-clearance of trading of Securities**

The Compliance Officer shall maintain a Register of Pre-clearance of trading of Securities and record therein the name and designation of the designated person submitting the application, date of the application, date and time of receipt of the application, nature of the transaction, number of Securities, consideration value, name of immediate relatives, if the transaction is in the name of immediate relatives and date and details of the actual transaction. A proforma of the Register is given in **FORM- VII**.

#### 6.7 **Holding period of securities:**

- (a) All Designated Persons who are permitted to trade shall not execute a contra Trade within a period of 6 (six) months following the prior trade.
- (b) In case the contra trade is necessitated by emergency, the Compliance Officer may waive the holding period after recording the reasons in writing, provided that such waiver does not violate this Code or the Regulations. Similarly, in the case of emergency of trade by a Compliance Officer, the Compliance Officer may obtain the waiver from the Managing Director or in his absence, the Chairman of the Board of Directors, provided that such waiver does not violate this Code or the Regulations. The application for waiver shall be made in the format prescribed at **Form VIII** hereto.

- (c) When a contra Trade is executed inadvertently or otherwise, in violation of the restriction, the profit from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act.

## 7. TRADING PLANS

7.1 An Insider shall be entitled to formulate a Trading Plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such Plan. The intimation on formulation of the Trading Plan may be given in the format specified at **Form IX**.

7.2 The Trading plan shall: –

- (a) not entail commencement of trading on behalf of the Insider earlier than 6 (six) months from the public disclosure of the Trading Plan;
- (b) not entail Trading for the period between the 20<sup>th</sup> (twentieth) Trading Day prior to the last day of any financial period for which results are required to be announced by the issuer of the Securities and the 2<sup>nd</sup> (second) trading day after the disclosure of such financial results;
- (c) entail trading for a period of not less than 12 (twelve) months;
- (d) not entail overlap of any period for which another Trading Plan is already in existence;
- (e) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- (f) not entail trading in securities for market abuse.

7.3 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the Trading Plan.

7.4 A Trading Plan once approved shall be irrevocable and the Insider(s) shall mandatorily have to implement the Trading Plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Trading Plan.

Provided that the implementation of the Trading Plan shall not be commenced if any UPSI in possession of the Insider at the time of formulation of the Plan has not become Generally Available Information at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes Generally Available Information.

7.5 Upon approval of the Trading Plan, the Compliance Officer shall notify the Plan to the Stock Exchanges.

## 8. **INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING AND PENALTY**

8.1 The Compliance Officer, as authorized by the Managing Director, shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in the Regulations to prevent insider trading.

8.2 The internal controls shall include the following:

- a) all employees who have access to unpublished price sensitive information are identified as designated person;
- b) all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;
- c) adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
- d) lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
- e) all other relevant requirements specified under these regulations shall be complied with;
- f) periodic process review to evaluate effectiveness of such internal controls.

8.3 The Audit Committee of the Company shall review compliance with the Regulations atleast once in a financial year. In case of leak/suspected leak of UPSI, the procedure as outlined in the Whistle Blower Policy of the Company shall be followed.

8.4 The Chief Executive Officer / Managing Director shall, subject to the approval of the Board of Directors, formulate written policies and procedures for inquiry in case of leak of UPSI or suspected leak of UPSI. The Board of Directors shall take necessary action(s) to initiate inquiry in case of leak of UPSI or suspected leak of UPSI and to promptly inform SEBI of such leaks, inquiries and results of such inquiries.

## **9. PROTECTION AGAINST RETALIATION AND VICTIMIZATION**

- 9.1 The Company shall provide suitable protection to its employees against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against any employee, who files a Voluntary Information Disclosure Form to SEBI, irrespective of whether the information is considered or rejected by SEBI or he or she is eligible for a Reward under these regulations, by reason of:
- 9.2 filing a Voluntary Information Disclosure Form under these regulations;
- 9.3 testifying in, participating in, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by SEBI; or
- 9.4 (iii) breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with SEBI in any manner.

## **10. PENALTIES**

- 10.1 Every Designated Person shall be individually responsible for complying the applicable provisions of this Code (including to the extent the provisions hereof are applicable to his/her immediate relatives). If any Designated Person violates or contravenes any of the provisions of this Code of Conduct, appropriate sanctions and disciplinary actions shall be taken by the Board of Directors of the Company, on recommendation of the Compliance Officer, which may include wage freeze, suspension, recovery, claw back, termination of employment, withholding of promotions or such other action as the Board of Directors may deem fit and any amount collected under this clause shall be remitted to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act
- 10.2 In case it is observed by the Company that there has been a violation of the Regulations, it shall promptly inform the stock exchange(s) where the concerned securities are traded, in such form and such manner as may be specified by the Board from time to time through Compliance Officer.
- 10.3 In case of violation of this code, the disciplinary action taken by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015. In case the SEBI Regulation or any Statutory Provisions



are more stringent than those contained in the Code, the SEBI Regulations / Statutory Provisions will prevail.

**11. DETAILS OF THE COMPLIANCE OFFICER:**

Any clarification with regard to the Code may be addressed to the Compliance Officer at the address given below:

**Company Secretary  
DCM Nouvelle Limited  
407, Vikrant Tower,04, Rajendra place,  
New Delhi-110008  
Email  
Email Id: dcmnouvelletd@gmail.com**

**12. DISCLAIMER**

The Insider Trading Code enumerated above is a framework for prohibition of Insider Trading in Securities of DCMNVL. However, it is the responsibility of every designated person and their immediate relatives to familiarize and ensure compliance with this Code, SEBI (Prohibition of Insider Trading) Regulations 2015 as amended from time to time and other applicable laws.

**For DCM Nouvelle Limited**

**Managing Director**

***\*This Code has been approved by the Board of Directors of the Company on October 29, 2021.***