

SVK FINVALUE ADVISORS PRIVATE LIMITED

(CIN: U70200GJ2019PTC107045)

Employee Investment Policy for SVK Finvalue Advisors Private Limited

1. Introduction

1.1 Purpose

This Employee Investment Policy is established to ensure that employees of SVK Finvalue Advisors Private Limited maintain the highest ethical standards and comply with SEBI regulations regarding their personal investments in financial instruments.

1.2 Scope

This policy applies to all employees, officers, and directors of SVK Finvalue Advisors Private Limited who may have access to confidential information and engage in financial activities regulated by SEBI.

2. Definitions

Designated Persons

Designated Persons include employees who have access to unpublished price-sensitive information and are subject to SEBI's insider trading regulations.

3. Insider Trading Regulations

All Designated Persons must strictly adhere to SEBI's insider trading regulations, including the prohibition of trading in securities of companies listed on stock exchanges while in possession of unpublished price-sensitive information.

4. Prior Approval

Designated Persons must obtain prior approval from the Compliance Officer before conducting any trades on stock exchanges while in possession of unpublished price-sensitive information.

5. Reporting

Employees must promptly report all transactions in securities to the Compliance Officer within specified timeframes.

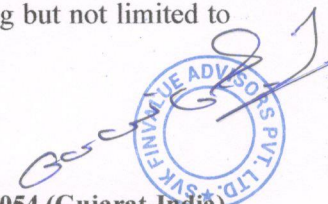
6. Restrictions on Investments

6.1 Prohibited Investments

Employees must not invest in securities or financial instruments that are subject to conflicts of interest with the interests of SVK Finvalue Advisors Private Limited, its clients, or SEBI regulations.

6.2 Restricted Investments

Designated Persons may be subject to additional restrictions on investments, including but not limited to investments in companies they cover or have access to non-public information about.



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7. Reporting

All employees must submit annual reports disclosing their securities transactions in any of the company they covered or have access to non-public information about, including details of any closed or open positions.

8. Consequences of Non-Compliance

8.1 Disciplinary Action

Non-compliance with this policy and SEBI regulations may result in disciplinary action, including but not limited to warnings, suspension, termination, or legal action.

8.2 Legal Consequences

Employees may also be subject to legal penalties and regulatory actions for violations of SEBI regulations.

9. Education and Training

Employees will receive training on this policy and SEBI regulations, with periodic refresher training as required.

10. Review and Amendments

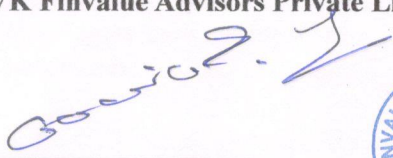
10.1 Policy Review

This policy will be reviewed periodically to ensure alignment with SEBI regulations and emerging best practices.

10.2 Amendments

Any amendments to this policy will be communicated to employees, and training will be provided as necessary.

**For and on behalf of
SVK Finvalue Advisors Private Limited**



**SHILPANG V. KARIA
DIRECTOR
DIN: 08388381**

