

# RADIANT CASH MANAGEMENT SERVICES LIMITED

## PROHIBITION OF INSIDER TRADING CODE

### 1.1.0 Applicability & Objective

- i. Short title and commencement - (1) This Code may be called Radiant Cash Management Services Limited - Prohibition of Insider Trading Code.
- ii. This Code is framed pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended by the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018.
- iii. This Code is applicable to designated persons of the Company and their immediate relatives as defined herein.
- iv. Objective - This code is designed to maintain the highest ethical standards of trading in Securities of the Company by persons to whom it is applicable.

### 2.1.0 Definitions

In this Code, unless the context otherwise provides:

- a. **“Act”** means the Securities and Exchange Board of India Act, 1992;
- b. **“Audit Committee”** means the Audit Committee of the Board of Directors of the Company;
- c. **“Board”** means the Board of Directors of the Company;
- d. **“Code”** means Radiant Cash Management Services Limited – Prohibition of Insider Trading Code;
- e. **“Company”** means Radiant Cash Management Services Limited;
- f. **“Compliance Officer”** means Company Secretary or any other person as may be appointed by the Board of Directors as the Compliance Officer;
- g. **“connected person”** means,-

(i) any person who is or has during the six months prior to the concerned act been associated with a 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himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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, -

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- (a) an immediate relative of connected persons specified in clause (i);  
or
  - (b) a holding Company or associate Company or subsidiary Company;  
or
  - (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
  - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
  - (e) an official of a stock exchange or of clearing house or corporation;  
or
  - (f) 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
  - (g) 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
  - (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
  - (i) a banker of the Company; or
  - (j) a concern, firm, trust, Hindu undivided family, Company or association of persons wherein a director of a Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest.
- h. **“designated person”** means persons specified by the Board in consultation with the Compliance Officer to be covered by this Code on the basis of their role and function in the Company and access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation namely:-
- (i) directors of the Company
  - (ii) promoters of the Company and entities of promoter group;
  - (iii) Key Managerial Personnel
  - (iv) Employees upto two levels below Managing Director of such listed company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information
  - (v) all Employees of the Company and its material subsidiaries who have access to UPSI in various business divisions and functions including Finance, IT and Secretarial.
- i. **“director”** means a director of the Company;
- j. **“employee”** means employee in the employment of the Company.
- k. **“financial year”** means the financial year followed by the Company under the Companies Act, 2013;
- l. **“generally available information”** means information that is accessible to the public on a non-discriminatory basis.

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- m. **"insider"** means any person who is:
- i) a connected person; or
  - ii) in possession of or having access to unpublished price sensitive information;
- n. **"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.
- o. **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;
- p. **"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
- q. **"Regulations"** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- r. **"Securities"** include equity shares, redeemable non-convertibles issued by the Company and interest therein;
- s. **"Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- t. **"trading"** means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any Securities, and "trade" shall be construed accordingly
- u. **"trading day"** means a day on which the recognized stock exchanges are open for trading.
- v. **"Unpublished Price Sensitive Information" ('UPSIS')** means any information, relating to 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;

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All other words and phrases will have the same meaning as defined under the Act or Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

### **3.1.0 Compliance Officer**

**3.1.1** The Board shall appoint a senior level employee as the Compliance Officer.

**3.1.2** The Compliance Officer shall be responsible –

- a. for setting forth policies, procedures under this Code and maintenance of records,
- b. monitoring of adherence to the rules and procedures for the preservation of “Unpublished Price Sensitive Information”,
- c. pre-clearing of trades
- d. monitoring of trades, and
- e. the implementation of the Code under the overall supervision of the Board.

**3.1.3** The Compliance Officer shall maintain a record of the designated persons and any changes made in the list of designated persons.

**3.1.4** The Compliance Officer shall assist all the employees in addressing any clarifications regarding the Regulations and the Code.

### **4.1.0 Communication, Procurement and Preservation of UPSI and Sharing of UPSI on need-to-know basis**

**4.1.1** No insider shall communicate, provide, or allow access to any UPSI, relating to a Company or Securities, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

**4.1.2** No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or Securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

**4.2.1** An UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:–

- (i) entail an obligation to make an open offer under the Takeover Regulations where the Board is of informed opinion that the sharing of such information is in the best interests of the Company;

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- (ii) not attract the obligation to make an open offer under the Takeover Regulations but where the Board is of informed opinion that the sharing of such information is in the best interests of the Company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine to be adequate and fair to cover all relevant and material facts.
- 4.2.2** For purposes of para 4.2.1, the Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of para 4.2.1, and shall not otherwise trade in Securities of the Company when in possession of UPSI.
- 4.2.3** The Board shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared under this Regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. The Files containing confidential information shall be kept secure. In the case of files and information maintained under electronic format, such files and information shall have adequate security such as login and password etc.
- 4.2.4** Unauthorised reading, dissemination, distribution or copying of UPSI is prohibited. If any employee receives any UPSI not intended for him, he shall report the same immediately to the Compliance Officer.
- 4.2.5** In case of the Compliance Officer have a suspicion/suspected leak of UPSI. He shall inform the same to Managing Director of the Company. In the deserving case, Managing Director of the Company will report to the Chairman of the Audit Committee the suspected leak of UPSI. If the Chairman of the Audit Committee forms a prima facie opinion that there is leak of UPSI. He may refer the case to carry out initial enquiry by any person including officer of the Company within 15 working days for appropriate investigation and needful action.
- 4.2.6** The Audit Committee shall issue a show cause notice to the suspected person to submit his justifications / reasons for leak of UPSI within a period of 15 working days.
- 4.2.7** The investigation shall be completed normally within 60 days of the reference made to the Audit Committee. If it is not completed within 60days, the Audit Committee shall record the reasons in writing for the delay.
- 4.2.8** The Audit Committee will, based on the findings and after conducting further investigation as it may deem fit, come to a final decision in the matter not later than 90 days from the date of reference made to the Audit Committee.

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**4.2.9** Where there is a violation by the Compliance Officer, the Managing Director of the Company shall perform the functions of the Compliance Officer.

**4.2.10** If anyone who makes false allegations of leak of UPSI or such practice, against any person to the Audit Committee shall be subject to appropriate disciplinary action in accordance with the rules, procedures and policies of the Company.

### **4.3.0 Trading when in possession of unpublished price sensitive information**

**4.3.1** (1) No insider shall trade in Securities of the Company when in possession of UPSI:

Explanation- When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

(i) the transaction is an off-market *inter-se* transfer between insiders who were in possession of the same UPSI without being in breach of para 4.1.0 and both parties had made a conscious and informed trade decision;

Provided that such UPSI was not obtained under para 4.2.1 of this Code.

Provided further that such off-market trades shall be reported by the insiders to the Company within two working days. The Company shall notify the particulars of such trades to the stock exchanges within two trading days from receipt of the disclosure or from becoming aware of such information.

(ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the UPSI without being in breach of para 4.1.0 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under para 4.2.1 of this Code.

(iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

(iv) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable Regulations.

(v) in the case of non-individual insiders: –

(a) the individuals who were in possession of such UPSI were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such UPSI when they took the decision to trade; and

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(b) appropriate and adequate arrangements were in place to ensure that the Regulations are not violated and no UPSI was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

(vi) the trades were pursuant to a trading plan set up in accordance with para 5.

**4.3.2** The onus of establishing, that connected persons were not in possession of UPSI, shall be on such connected persons.

### **5.1.0 Trading Plan**

**5.1.1** 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.

**5.1.2** The trading plan shall:–

- (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- (ii) not entail trading for the period between the 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 second trading day after the disclosure of such financial results;
- (iii) entail trading for a period of not less than twelve months;
- (iv) not entail overlap of any period for which another trading plan is already in existence;
- (v) 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
- (vi) not entail trading in Securities for market abuse.

**5.1.3** The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations 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 plan.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

**5.1.4** The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the Securities outside the scope of the trading plan.

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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 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 so as to avoid a violation of para 4.3.1.

**5.1.5** Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

### **6.1.0 Trading window**

**6.1.1** The designated person shall not trade in Securities of the Company when the trading window is closed as under:

- (i) Trading window closure shall commence from the first day of the month following the respective quarter, half-year or financial year, as the case may be, till 48 hours from the date of the Board Meeting convened for the purpose of approval of the periodical financial results as per the regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI – LODR).
- (ii) In case of any other UPSI, the trading window shall be closed during the period as may be notified by the Compliance Officer from time to time on receipt of instructions from the Managing Director in the circumstances when the designated persons or a class of designated persons are reasonably expected to be in possession of the UPSI.

**6.1.2** The trading window shall re-open 48 hours after the information referred to above becomes generally available.

**6.1.3** The designated persons shall conduct all their tradings in the Securities of the Company only when the trading window is open

### **7.1.0 Pre-clearance of trades**

**7.1.1** Pre-clearance of trades: All designated persons and their immediate relatives who intend to trade (purchase or sale) in Securities of the Company during the period the trading window is open shall get the transaction pre-cleared as under:

<b>Pre-clearance Authority</b>	<b>Applications for pre-clearance made by</b>
<b>Chairman of Audit Committee</b>	Managing Director of the Company for trading in shares of the Company.
<b>Managing Director</b>	(i) Compliance Officer of the Company for trading in shares of the Company.  (ii) Designated person whose cumulative trading in shares of the Company during a financial year in excess of 5,000 shares.



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<b>Compliance Officer</b>	Designated persons for trading in excess of 1,000 shares or Rs.10,00,000/-, whichever is lower, per calendar quarter whose trading in shares of the Company in a financial year is less than 5000 shares.
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### 7.1.2 Procedure of Pre-clearance of trades

An application may be made in **Form I** to the Compliance Officer indicating-

- a. the estimated number of Securities that the designated persons intend/s to trade in, the details as to the depository participant with which he/his immediate relatives has/have an account,
- b. the details as to the Securities of the Company held by him or his immediate relatives in electronic and physical mode,
- c. such other details as may be required by the Compliance Officer in this behalf, and
- d. in the case of immediate relative who intends to trade in Securities of the Company, the application is to be moved through the designated person of whom he/she is immediate relative.

**7.1.3** At the time of making the application for pre-clearance for trading in the Securities a declaration, in **Form II**, shall be executed in favour of the Company by such designated persons except Promoter of the Company incorporating, inter alia, the following paras, as may be applicable:

- a. He/she does not have any access and has not received UPSI up to the time of signing the declaration.
- b. He/she has access to or receives UPSI after the signing of the declaration but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from trading in the Securities of the Company till the time such information becomes public.
- c. He/she has not contravened the Code as notified by the Company from time to time.
- d. He has made a full and true disclosure in the matter.

**7.1.4.** The Company may require such persons to furnish a statement of holding by him/his immediate relatives in **Form III** at the time of pre-clearance.

### 8.1.0 Other restrictions

**8.1.1** All designated persons shall execute their tradings in respect of Securities of the Company within 7 days after the approval of pre-clearance is given. If the order is not executed within 7 days after the approval is given, the pre-clearance granted to them shall be deemed to have been cancelled and in case the , designated persons desires to trade in the Securities, he must pre-clear the transaction again. On execution of the pre-cleared tradings in Securities, designated persons shall intimate the execution of the trade in **Form IV**.

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**8.1.2** The designated persons and their immediate relatives who buy or sell any number of Securities of the Company shall not execute contra trade i.e. sell or buy any number of Securities during the next six months following the prior transaction. The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate this Code.

**8.1.3** In the event of execution of contra trade inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the Board under the Act except in case of the trades pursuant to exercise of stock options or for trade carried out in accordance with an approved trading plan.

### **9.1.0 Disclosures**

The designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis 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 and cell 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 onetime basis.

Explanation – The term “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 during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.”

### **10.1.0 Reporting Requirements for transactions in Securities**

#### **10.1.1 Initial Disclosures**

Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a Promoter shall disclose his holding of Securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter in **Form B** annexed to the Regulations.

#### **10.1.2 Continual Disclosures**

- (a). Every Promoter, directors, designated person of the Company, immediate relatives of directors and employees of the Company shall disclose to the Company the number of such Securities acquired or disposed of within two trading days of such transaction in **Form C** annexed to the Regulations 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 **ten lakh rupees** or such other value as may be specified;

## **RADIANT CASH MANAGEMENT SERVICES LIMITED**

- (b). Every Designated Persons of the Company shall disclose annual statements of their holding, and the holding of their Immediate Relatives and the person with whom such Designated Person shares a Material Financial Relationship, of the Company's Securities to the Compliance Officer as on 31st March every year or any other financial year as may be adopted by the Company from time to time in the form as set out in **Form VI** or electronically or as near a format thereto or any other form as may be prescribed by the Compliance Officer from time-to-time.

### **10.1.3 Disclosures by Company to the Stock Exchange(s)**

The Compliance Officer will notify the particulars of such trading to the stock exchange within two trading days of receipt of the disclosure in the **Form C** annexed to the Regulations duly filled in and signed.

### **10.1.4 Disclosures by other connected persons**

The Company may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in Securities of the Company in **Form D** annexed to the Regulations and at such frequency as may be determined by the Company in order to monitor compliance with these regulations.

- 10.1.5** The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the directors/designated persons for a period of five years.

- 10.1.6** The Compliance Officer shall place before the Managing Director on a monthly basis all the details of the trading in the Securities by directors, designated persons together with the accompanying documents that such persons had executed. The Compliance Officer shall also place before the Board of Directors quarterly reports in this regard.

- 10.1.7** The Board shall ensure that the Managing Director ensures compliance with this Code.

- 10.1.8** The Audit Committee of the Company shall review compliance with the provisions of this Code at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

### **11.1.0 Penalty for contravention of Code**

- 11.1.1** The designated person (either directly or through their immediate relatives) who trades in Securities or communicates any information for trading in Securities in contravention of the Code may be penalised and appropriate action may be taken by the Company.

- 11.1.2** The persons who violate this Code shall, in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action, which in respect of a Designated Person, who is also an Employee of the Company may include wage freeze, suspension, recovery, clawback, termination of employment or ineligible for future participation in ESOPs.

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### **12.1.0 Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015**

**12.1.1** In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall inform SEBI of such violation.

**12.1.2** Any Insider who indulges in insider trading in contravention of these Regulation will be liable to a penalty which shall not be less than Rs. 10 lakhs but which may extend to Rs. 25 crores or three times the amount of profits made out of insider trading, whichever is higher as provided under Section 15G of the SEBI Act, 1992. Under Section 24 of the SEBI Act, 1992, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with fine, which may extend to twenty- five crore rupees or with both. Further, in case any person fails to pay the penalty imposed by the adjudicating officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month but which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both.

If any rules under the Code are in conflict with or inconsistent with the Regulations and in the event of any amendment to the Regulations or issuance of any clarification relating to prohibition of insider trading, such amendment/ clarification shall be deemed to have been included in this Code.

The Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information and Policy for handling and protection of Unpublished Price Sensitive Information pertaining to periodical financial results shall forms part of this Code.

This Code is subject to review from time to time. In the event of any amendment in SEBI (PIT) Regulations, the same shall be deemed to be forming part of this Code and the same will prevail in case any provision of this Code inconsistent with the said amendment.

**RADIANT CASH MANAGEMENT SERVICES LIMITED**

**Form I**

(Application for pre-clearance. please See Para 7.1.2 of the Code)

**Date:**

**To**

**The Compliance Officer**

**Radiant Cash Management Services Limited**

Radiant Building, 4/3 Raju Nagar, First Street, Okkiyam Thoraipakkam,  
Old Mahabalipuram Road, (OMR), Chennai – 600096

**Dear Sir**

**Sub: Permission for trading in Securities of Radiant Cash Management Services Limited (“The Company”)**

In accordance with the Radiant Cash Management Services Limited - Prohibition of Insider Trading Code, I hereby request you to permit me / my immediate relative(s) (specify Name in case of immediate relative(s)-----) singly/ jointly, to sell or purchase securities of the Company. The details as required are given below:

Type of security to be purchased/sold	Registered Folio no: (In case of Physical holding)	DP ID ( In case of Demat holding)	Client ID (In case of Demat holding)	No. of Securities intended to be dealt with	Name and address of the Broker

In case the permission is granted, I/we shall comply with the requirements of the minimum holding period of six months with respect to the Securities purchased in terms of the permission. Please also find attached a copy of the undertaking in this regard.

I request you to kindly accord the approval as requested.

Thanking you

Yours truly,

**Name: ----- Signature: -----**

**Employee Code: ----- Designation: -----**

**Department: ----- Branch: ----- Location: -----**

(Strike off whichever is not applicable)

**RADIANT CASH MANAGEMENT SERVICES LIMITED**

**Form II**

(Declaration for pre-clearance. please See Para 7.1.3 of the Code)

**Date:**

**To**

**The Compliance Officer**

Radiant Cash Management Services Limited

Radiant Building, 4/3 Raju Nagar, First Street, Okkiyam Thoraipakkam,

Old Mahabalipuram Road, (OMR), Chennai – 600096

**Dear Sir,**

**Sub: Declaration**

I/My immediate relative(s) (Specify Name in case of immediate relative(s) -----) am/is/are desirous of trading in Securities of Radiant Cash Management Services Limited (“The Company”) as mentioned in my application dated..... for pre-clearance of the transaction.

In accordance with the Radiant Cash Management Services Limited -Prohibition of Insider Trading Code, I/We hereby confirm that:

- a. I/We have no access to nor do I/We have any information that could be construed as unpublished price sensitive information up to the time of signing this declaration.
- b. In the event that I/We have access to or received any information that could be construed as unpublished price sensitive information after signing this declaration but before executing the transaction for which approval is sought, I/We shall inform the Compliance Officer of the same and shall completely refrain from trading in the Securities of the Company till the elapse of 24 hours from the time such information becomes public.
- c. I/We have not contravened the regulations and guidelines applicable to me in respect of Prohibition of Insider Trading, as may be notified by the Company or SEBI from time to time.
- d. I/We have made full and true disclosure in the matter.

I/We further confirm that in case the permission is granted, the said Securities will be sold / purchased within 7 days of the date of receipt of permission and the details of such sale/purchase will be intimated to the Company within 5 days from the date of the trade.

Yours truly,

**Name: ----- Signature: -----**

**Employee Code: ----- Designation: -----**

**Department: ----- Branch: ----- Location: -----**

(Strike off whichever is not applicable)

**RADIANT CASH MANAGEMENT SERVICES LIMITED**

**Form III**

(Statement of holding for pre-clearance. please See Para 7.1.4 of the Code)

**Date:**

**To**

**The Compliance Officer**

Radiant Cash Management Services Limited

Radiant Building, 4/3 Raju Nagar, First Street, Okkiyam Thoraipakkam,

Old Mahabalipuram Road, (OMR), Chennai – 600096

**Dear Sir,**

**Sub: Intimation of holding of Securities of Radiant Cash Management Services Limited (“The Company”)**

In accordance with the Radiant Cash Management Services Limited - Prohibition of Insider Trading Code, I hereby inform you that I / my immediate relative/s mentioned below hold – singly / jointly, the following Securities of the Company as on ....., as per details given below:

Name	Type of Security	Regd Folio no: (In case of Physical holding)	DP Id (In case of Demat holding)	Client ID (In case of Demat holding)	No. of Securities held
Self					
immediate relative/s (Pl give name & Relationship )					
1. ....					
2. ....					
3. ....					

Kindly take note of the same.

Thanking you,

Yours truly,

**Name:** ----- **Signature:** -----

**Employee Code:** ----- **Designation:** -----

**Department:** ----- **Branch:** ----- **Location:** -----

(Strike off whichever is not applicable)

**RADIANT CASH MANAGEMENT SERVICES LIMITED**

**Form IV**

(Intimation of trading. please See Para 8.1.1 of the Code)

**Date:**

**To**

**The Compliance Officer**

Radiant Cash Management Services Limited

Radiant Building, 4/3 Raju Nagar, First Street, Okkiyam Thoraipakkam,

Old Mahabalipuram Road, (OMR), Chennai – 600096

**Dear Sir,**

**Sub: Intimation of trading in Securities of Radiant Cash Management Services Limited (“The Company”)**

I refer to my application dated \_\_\_\_\_ for pre-clearance of trading in Securities of Radiant Cash Management Services Limited and your approval for the same dated \_\_\_\_\_

In accordance with para 7.1.1 of Radiant Cash Management Services Limited - Prohibition of Insider Trading Code, I hereby inform you that I/ my immediate relative/s specified below have purchased/ sold, singly/jointly, \_\_\_\_\_ Securities of the Company on \_\_\_\_\_. The details of the trading are given below:

Name (s) Of holder(s)	Relationship with the Employee	Regd Folio no:/ DP ID & Client ID	No. of Securities held before the transaction	No. of Securities Transacted (Purchase (+)/ Sale(-))	Date of transaction	Date of approval	Balance holding as on _____

I /we declare that I / we have complied with the requirements of the minimum holding period of six months with respect to the Securities sold as aforesaid.(Applicable in case of sale)\*

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance Officer / SEBI any of the following documents:

1. Broker’s contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery Instruction Slip (applicable in case of sale transaction).

Thanking you

Yours truly,

**Name:** ----- **Signature:** -----

**Employee Code:** ----- **Designation:** -----

**Department:** ----- **Branch:** ----- **Location:** -----

(Strike off whichever is not applicable)



**RADIANT CASH MANAGEMENT SERVICES LIMITED**

**Form V**  
(Permission for trading in Securities)

**Date:**

**To**

**Mr. .... ,**

**Add. .... .**

**Dear Sir,**

**Sub: Permission for trading in Securities of Radiant Cash Management Services Limited (“The Company”)**

Please refer to your application dated ----- for trading in Securities in the Company.

This is to inform you that your request for trading in.....(Nos) Securities in the Company as mentioned in your above-mentioned application is approved. Please note that the said transaction must be completed on or before..... (Date), that is within 7 days from today.

Your attention is drawn to para 8.1.1 of the Code. As per this para, if the trading is not executed within 7 days hereof, the pre-clearance granted to you shall be deemed to have been cancelled and in case you desire to trade in the Securities you are required to pre-clear the transaction again.

For Radiant Cash Management Services Limited

Compliance Officer

**Important:** You are also advised to comply with the disclosure requirements as specified under Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to initial and continual disclosures to the extent applicable to you in case the purchase of Securities permitted herein attract those Regulations.

**RADIANT CASH MANAGEMENT SERVICES LIMITED**

**Form VI**

**Disclosure by the Designated Persons**

**Periodical Declaration as on 31<sup>st</sup> March, \_\_\_\_ under SEBI (Prohibition of Insider Trading) Regulations, 2015**

**To,**  
**The Compliance Officer,**  
**Radiant Cash Management Services Limited**

**I. Details of the Designated Person**

Name : \_\_\_\_\_  
Designation : \_\_\_\_\_  
PAN : \_\_\_\_\_  
Other Identifier Type & No : \_\_\_\_\_  
No. of Equity Shares held as on 31<sup>st</sup> March, \_\_\_\_ : \_\_\_\_\_  
Telephone/Mobile No.: \_\_\_\_\_  
Qualification(s) & Educational Institution(s) : \_\_\_\_\_  
Name(s) of Past Employer(s): \_\_\_\_\_

**II. Details of Immediate Relatives / Persons with Material Financial Relationship:**

<b>Name of Immediate Relatives / Persons with Material Financial Relationship</b>	<b>Relation-ship</b>	<b>PAN</b>	<b>Telephone / Mobile No.</b>	<b>No. of Equity Shares held as on 31<sup>st</sup> March, _____</b>

In compliance of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and as mentioned in Code of Conduct of Radiant Cash Management Services Limited ("the Company"), I, (Name of Designated Person) hereby undertake/declare that:

1. I/my Immediate Relative(s) any of whom is either dependent financially on me or consults me in taking decisions relating to trading in securities have not executed intra day contra trade or intra week contra trade in the securities of the Company.
2. I/my Immediate Relative(s) have not contravened the Company's Code as notified by the Company from time to time.
3. I have made full and true disclosure in the matter.

Signature:

Name:

Date:

## RADIANT CASH MANAGEMENT SERVICES LIMITED

### Form B

#### Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

#### [Regulation 7 (1) (b) read with Regulation 6 (2)- Disclosure on becoming a director/KMP/Promoter]

To,  
Radiant Cash Management Services Limited  
(ISIN: \_\_\_\_\_)

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN / DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors /immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Share holding
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Name & Signature:

Designation :

Name:

Date:

## RADIANT CASH MANAGEMENT SERVICES LIMITED

### Form C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015

[Regulation 7 (2) read with Regulation 6 (2)]

To,  
Radiant Cash Management Services Limited  
(ISIN: \_\_\_\_\_)

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN, & address with contact nos..	Category of Person (Promoters/KMP/Directors/Immediate relatives/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/disposed				Securities held post acquisition / disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Company	Mode of acquisition/ disposal (on market / public rights/ preferential offer/ off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was Executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. & % of shareholding	Type of security (For eg. - Shares, Warrants, Convertible Debentures, etc.)	No.	Value	Transaction type (Buy / Sale/ Pledge/ Revoke/ Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. & % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

## RADIANT CASH MANAGEMENT SERVICES LIMITED

Details of Trading in derivatives of the Company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Trading in derivatives (Specify type of contract, futures or options etc)					
Type of Contract	Contract Specifications	Buy		Sell	
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)
16	17	18	19	20	21

Note: In case of options, notional value shall be calculated based on premium plus strike price of options.

Name & Signature:

Designation :

Name:

Date:

## RADIANT CASH MANAGEMENT SERVICES LIMITED

### Form D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by other Connected Persons as identified by the Company

PAN No., CIN/DIN, & address with contact nos. of Connected Persons, as identified by the company	Connection with the company	Securities held prior to acquisition/ disposal		Securities acquired/disposed				Securities held post acquisition / disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Company	Mode of acquisition/ disposal (on market / public rights/ preferential offer/ off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was Executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. & % of shareholding	Type of security (For eg. - Shares, Warrants, Convertible Debentures, etc.)	No.	Value	Transaction type (Buy / Sale/ Pledge/ Revoke/ Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. & % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

## RADIANT CASH MANAGEMENT SERVICES LIMITED

### Details of Trading in derivatives of the Company by other connected persons as identified by the Company

Trading in derivatives (Specify type of contract, futures or options etc)					
Type of Contract	Contract Specifications	Buy		Sell	
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)
16	17	18	19	20	21

Note: In case of options, notional value shall be calculated based on premium plus strike price of options.

Name:

Signature:

Place: