***CLEARMIND CONSULTANCY PRIVATE LIMITED***

***DEALING ROOM POLICY***

***DEALING ROOM POLICY (PMS)***

## 1. Objective:

This Policy is formulated to regulate the functioning, control, and monitoring of the dealing room of the PMS entity in compliance with the provisions of the SEBI (Portfolio Managers) Regulations, 2020 and guidelines issued by the Securities and Exchange Board of India. The objective is to ensure transparency, security, and integrity in trade execution activities.

## 2. Dedicated Dealing Room Infrastructure

The PMS shall maintain a separate and independent dealing room exclusively for carrying out trading activities. The dealing room shall be equipped with dedicated computer systems, trading terminals, and necessary infrastructure, which shall be used strictly for execution of trades. No non-essential or unauthorized software shall be installed on such systems to ensure data security and regulatory compliance.

## 3. Designated Staff and Authorized Personnel

The dealing room operations shall be handled only by designated staff, including the Principal Officer, Compliance Officer, and additional employees as required under Regulation 20(e) of the SEBI (Portfolio Managers) Regulations, 2020. Access shall be limited to Authorized Personnel such as Dealers, Fund Managers (having qualifications equivalent to the Principal Officer), and other approved individuals responsible for PMS trading activities.

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## 4. Access Control and Entry Restrictions

Entry to the dealing room shall be strictly restricted to Authorized Personnel during trading hours. The PMS shall implement appropriate mechanisms to monitor and control entry and exit to prevent unauthorized access. Any IT or administrative personnel entering the dealing room during trading hours shall do so only when necessary and in the presence of at least one Authorized Personnel.

## 5. Surveillance and Monitoring Mechanism

The dealing room shall be designed to be opaque and shall be equipped with CCTV cameras to monitor internal activities, including entry and exit points. CCTV recordings shall be maintained securely for a minimum period of three financial years. The PMS shall ensure periodic backups of such recordings on separate storage devices on a weekly or monthly basis.

## 6. Communication and Device Restrictions

- No communication devices, including mobile phones or personal electronic gadgets, shall be permitted inside the dealing room.
- During trading hours, no external verbal communication shall be entertained, and all necessary communication shall be conducted through designated official email channels to maintain proper audit trails and compliance standards.
- Use of mobile phones is not allowed during market hours and after market hours landline phone is encouraged to be used as per best industry practices, as all conversations are recorded.
- Recorded lines would be listened by authorised person(s) on a random basis.

- Mobile phones should be kept in switched off/ silent mode with the department assistant during trading hours. Exceptions any, if due to personal exigencies should be approved by the compliance officer.
- Restricted Access to Dealing Rooms would be allowed during trading session.
- No use of mobile phones for taking orders or confirmation of deals.
- Mobile phones must be deposited at the reception if entering the dealing room(s) and should not be used thereafter till 4.00pm on that day.
- Any violation from the above policies would attract penalty in terms of initiating disciplinary action against the employee and/or termination of services.

## 7. Record Maintenance and Data Retention

All electronic records relating to dealing room activities, including emails and recorded telephonic conversations originating from the dealing room, shall be preserved for a minimum period of eight years. Such records shall be maintained securely and shall be readily accessible for regulatory review or audit purposes.

## 8. Applicability Based on AUM

The applicability of dealing room requirements shall be determined based on the Assets Under Management (AUM) of the PMS entity, as specified by SEBI from time to time. The AUM shall be considered as per the prescribed dates for determining compliance applicability in the relevant financial year.

## 9. Compliance, Review, and Accountability

The Principal Officer and Compliance Officer shall be responsible for ensuring adherence to this Policy and applicable regulatory requirements. The PMS shall conduct periodic reviews and internal audits to ensure compliance, and any deviations shall be treated seriously and addressed with appropriate corrective actions.

**<u>Regards,</u>**

**<u>Clearmind Consultancy Private Limited</u>**