

The Company Secretary
All Listed Companies,

**Sub: Insider Trading Compliance Monitoring Module (ITCM)
New service for Listed Companies**

As a part of one of the compliance monitoring exercises a Compliance Officer of the listed company has to monitor the trading activities in company's securities by its employees / connected persons so that Company complies with SEBI (Prohibition of Insider Trading) Regulations, 2015.

To assist Compliance Officer in monitoring the trading activities, Exchange is pleased to offer a new service to listed companies so as to enable Compliance Officer to check the trading done by its employees, employees in the group companies and connected persons in the securities of the company. With this service, Compliance Officer can cross verify submissions/declarations made by the employees and identify any discrepancies in the disclosure / disclosure not made by the employees, if any, and remain compliant with SEBI (PIT) Regulations, 2015.

Listed companies desirous of availing this service are required to submit an undertaking to the Exchange (as per **Annexure – A**) confirming that a requisite consent / No Objection Certificate from the concerned Employees / Connected persons for sharing their PAN is duly submitted to the Compliance Officer and affirming that the Exchange may retrieve the trade data of such Employees from the trading systems of the Exchange and provide the data to the Compliance Officer. Additionally, the listed company is required to provide the Exchange with the necessary approvals from the Board authorizing Compliance Officer for sharing the PAN of Employees of the Company, its subsidiaries, associate companies and Connected Persons with Exchange.

The trading information (i.e. data pertaining to trading in securities and futures & options contracts) shall be provided to the authorized person of the listed company.

The Exchange will provide the trading information on Daily, Weekly, Monthly, Quarterly and Adhoc basis as per the individual needs of the listed entities. The information provided to listed entity is based on their choice of knowing i.e. just an indicator on whether trade was executed by the employee without any details of the trades or information about the value of the trades executed. Details about the new service and procedure to be followed by the Company to avail the service is provided in NEAPS portal under 'Value Added Service'.

Exchange invites all Listed Companies to register for the service which will commence from April 20, 2018. For the first 6 months i.e. till September 30, 2018, the service will be free of cost and thereafter, it shall be a chargeable service. The changes for the same shall be announced subsequently. In case of any clarification, please contact Mr. Vishnu Vyas on 022-26598236/8239.

**For and on behalf of
National Stock Exchange of India Limited**

**Janardhan Gujran
Asst. Vice President**