

INVESTMENT POLICY BASED ON SEBI CIRCULAR CIR/MIRD/6/2013 DATED AUGUST 28,2013 ON GUIDELINES FOR DEALING WITH CONFLICT OF INTEREST FOR INVESTMENT/ TRADING BY CRAs ACCESS PERSONS AND OTHER EMPLOYEES

1	Investment by Access Person (i.e., MD/CRO)	Cannot invest in the securities rated by CARE for a period of 30 days after the date on which rating is assigned by the Rating Committee
2	Employees	
a)	Analyst, Grouphead and Rating Head	<ul style="list-style-type: none"> i) Cannot invest in the securities whose rating assignments are handled by them. ii) Cannot invest in the securities rated by CARE for a period of 30 days after the date on which rating is assigned by the Committee. iii) Can trade in <u>securities</u> other than (i), after taking the prior approval of the Compliance Officer. Annual ceiling of Rs. 2 lakh per share in a year. No limit on selling of the existing holding of shares. No opposite transactions allowed in 30 trading days. iv) Can invest in CARE shares upto 5 lakh in a year, after taking prior approval of Compliance officer. No opposite transactions allowed in 6 months.
3	Other Employees	<p>Cannot invest in the securities rated by CARE for a period of 30 days after rating is assigned by the Committee.</p> <p>Can invest in the securities after taking the prior approval of the Compliance Officer.</p> <p>The Compliance Officer can invest after taking the prior approval of the Managing Director.</p> <p>No opposite transactions allowed in 30 trading days/6 months for non-CARE/ CARE shares respectively.</p>
4	Rating Committee Members	
	Internal Rating Committee	<p>Cannot invest in the securities rated by CARE for a period of 30 days after rating is assigned by the Committee.</p> <p>Additionally, 2 (a)(i) – (iv) will apply for team members handling cases.</p>

	External Review (Appeal) Committee	<p>The External Review Committee (ERC) member will disclose their investment to CARE at the time of appointment.</p> <p>ERC members will not participate in the discussion for assigning rating to the entities in which he/she holds any investment or is a Director.</p> <p>Cannot invest in those securities which are referred to them for review (appeal) for a period of 30 days after rating is assigned by the Committee.</p>
5	CRA	CARE invests surplus funds in fixed deposits and debt mutual funds only.