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## **Insider Trading Compliance Platform**



## About Us

- **Vigilanté** is a web based insider trading platform which helps the compliance officer to centrally manage, track and follow up on all compliances and generate reports pertaining to Insider Trading.
- **Vigilanté** is a part of the **Kirtane & Pandit group**.
- The **Kirtane & Pandit Group** of companies are well-known across domains:
  - **Kirtane & Pandit, Chartered Accountants**, is one of the largest and oldest CA firms in Western India with an impressive track record of more than 6 decades
  - **ESOP Direct**, is the market leaders in the Equity compensation domain
  - **KPIT Technologies Ltd.**, a listed company engaged in IT services to Manufacturing and Automotive industry globally.
- As a group we bring strong credentials:
  - Compliance, Auditing and Finance domain
  - Rich experience in offering managed services – Outsourced services using web based platforms
  - In-house expertise in platform development and support
  - Track record in rendering Value services



### Compliance Officer

- Design and publish Code of Conduct & Code of Fair Disclosure
- Identify and maintain list of Insiders and connected persons and their relatives – Designated Persons
- Create awareness among insiders / connected persons
- Seek Initial and On-going/Continual Disclosures
- Announce and monitor Trading Window
- Review and approve Pre clearances
- Decide on exceptions / waivers & record reasons
- Monitor actual trades v/s disclosures / pre clearance and the timelines
- Monitor and track contra trades
- Receive and track Trading Plans
- Ensure that agencies/vendors with UPSI have a Code of Conduct
- History for 5 years' disclosures to be maintained

### Insiders

- Ensure adherence to Insider Code of Conduct
- Employees designated as Insiders to seek pre clearances before trading
- Make on-going disclosures for self and immediate relatives where transaction value crosses threshold
- All employees (even those who are not Insiders) have to disclose all trades made by them in employer's securities where transaction value crosses threshold limit

### Connected persons

- Implement Code of conduct within its organizations
- Make disclosures and seek pre clearances from listed entity for any trade in securities of the listed company with whom connected

### Disclosures

- Initial Disclosures – Internal Reporting
- Continual Disclosures - Report to Stock exchanges for all trades above threshold for designated persons and other employees



## Compliance Officer

- Design and publish Code of Conduct
- Identify and maintain list of Insiders and connected persons and their relatives

## Employees

- Make timely disclosures for self and immediate relatives
- Seek pre-clearances before trading

### The need :

- Automated solution that will
  - Streamline the process, reduce paperwork
  - Ensure tracking – alerts, reminders, reporting
  - Auto approve clearances (below threshold)
  - Seek external data on actual trades and reconcile with disclosures and pre clearances

- Receive and track Trading Plans
- Ensure that agencies/vendors with UPSI have a compliance Code of Conduct

## Disclosures

- Report to stock exchanges for all the trades of Insiders and their relatives, connected persons
- History for 5 years' disclosures to be maintained



# Compliance needs

## Compliance Officer

- Design and publish Code of Conduct
- Identify and maintain list of Insiders and connected persons and their relatives

## Employees

- Make ongoing disclosures for self and immediate relatives
- Seek clearances before trading

### The need :

- Automated solution that will
  - Streamline the process, reduce paperwork
  - Ensure tracking – alerts, reminders, reporting
  - Auto approve clearances (below threshold)
  - Seek external data on actual trades and reconcile with disclosures and pre clearances

Presenting



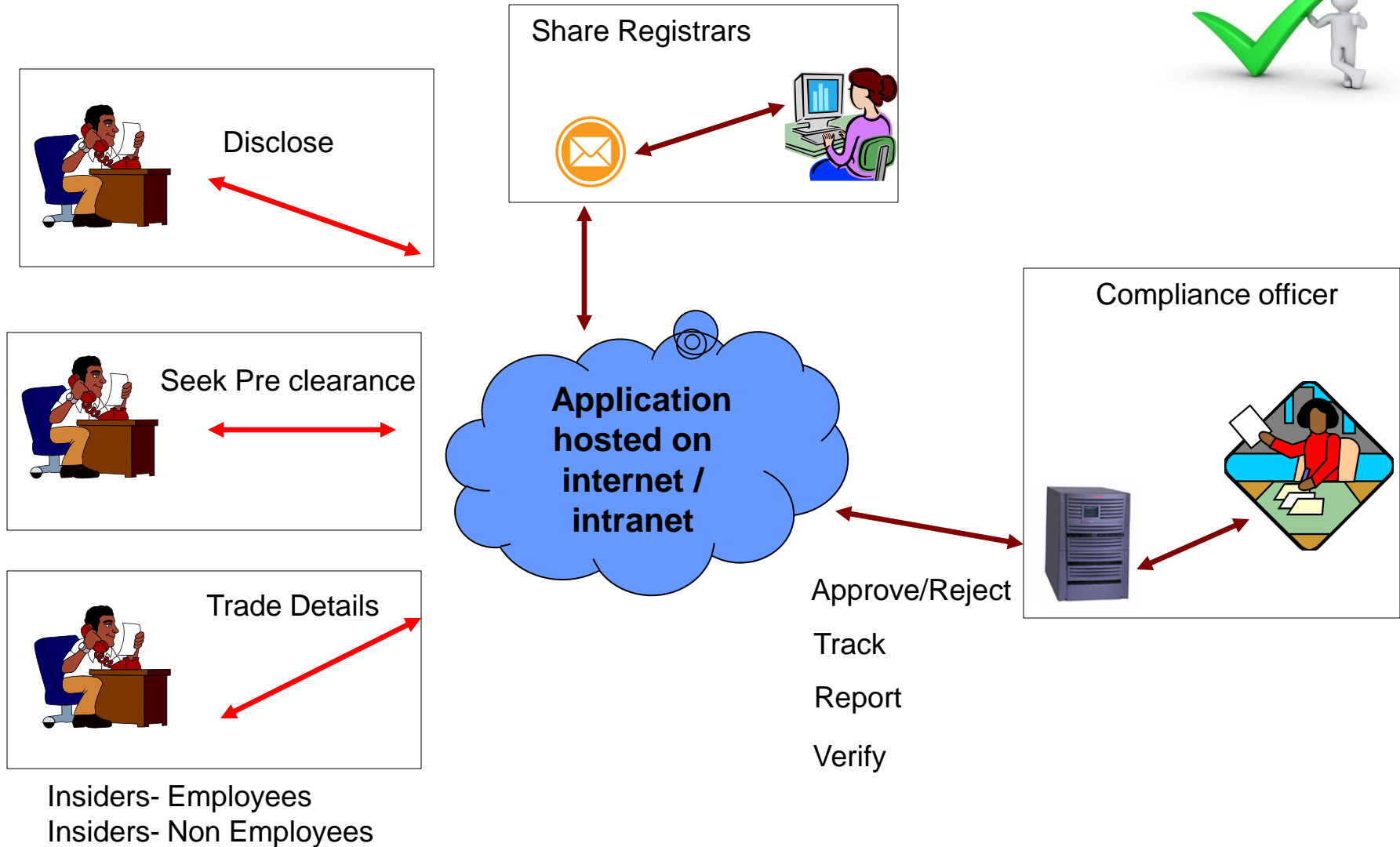
Your Insider radar

- Receive and track Trading Plans
- Ensure that agencies/vendors with UPSI have a compliance Code of Conduct

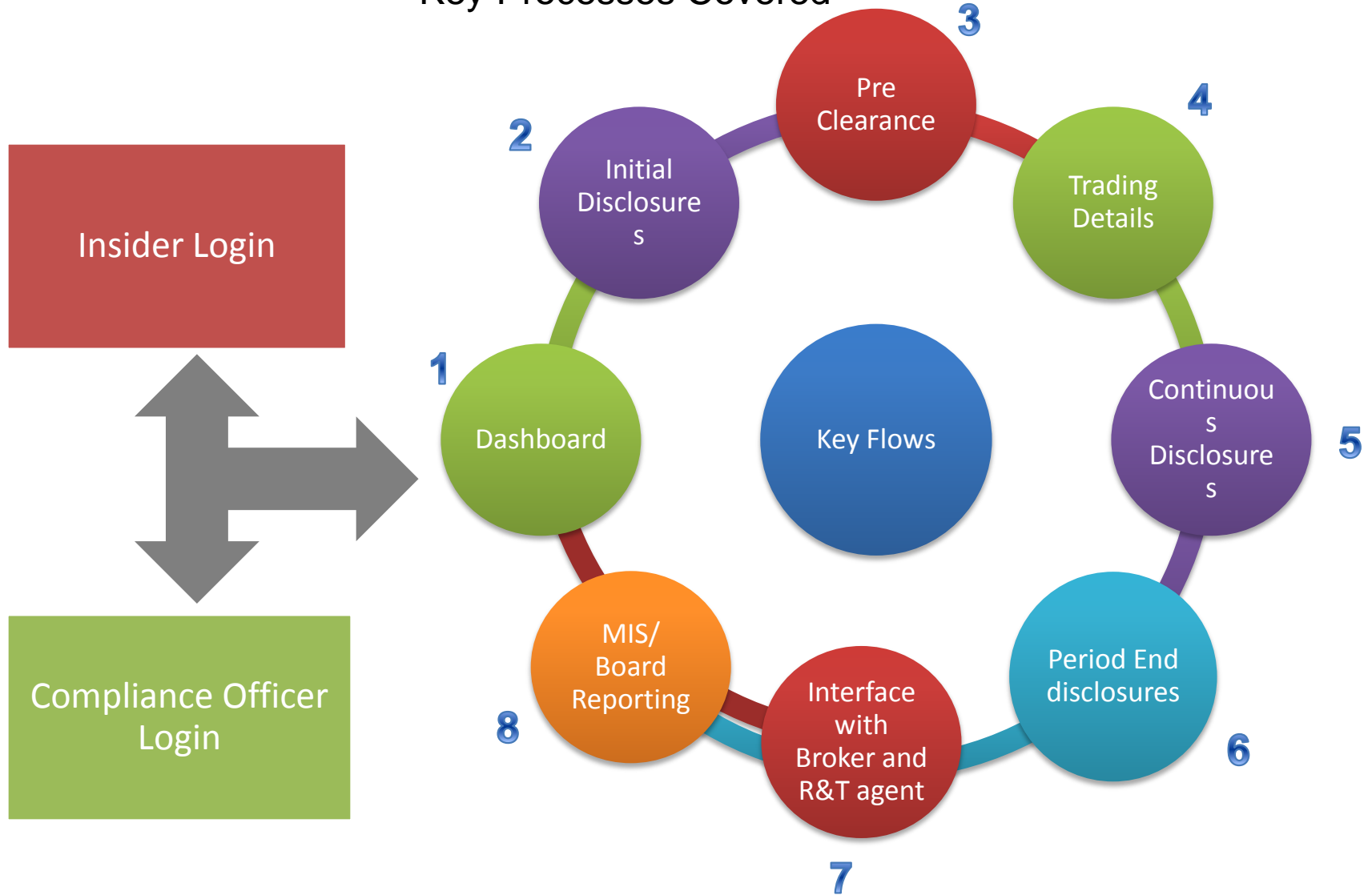
## Discl

- Register on stock exchanges for all the trades of Insiders and their relatives, connected persons
- History for 5 years' disclosures to be maintained

# Web based Application: Vigilanté: Flow



### Key Processes Covered



### User Creation

**CO User:** - Role based access rights  
- Delegation of activities

**Access to :** Employees/ Non Employees/  
Corporates or even Non Insider  
Employees

### Master Set Ups

**Policy documents/ policies/ trading windows:** Different configurations for different insiders / employees

**Masters:** Relationship masters/ reasons for non trade

**Notifications: Emails / PopUps:** Activities, frequency as well as message can be configured separately for different users

### Transactions

Initial Disclosures → Pre clearance → Trade Details → Continuous Disclosures → Period End disclosures

**Configurable:** Steps/ Tool tips/ Labels/ Grids

**Pending Activities:** Prominently displayed

**Submission Deadlines:** Configurable / delays tracked based on these dates

### Reporting

Dashboard → Transaction status → Stock Exchange reporting → Non compliance report

**Grids and Label names :** Configurable/ downloaded to Excel

**Stock Exchange Reporting:** In Prescribed formats

**Dashboard:** Pending Activities/ Transaction List





# Benefits of using Vigilanté



**Our goal - facilitate compliance**



- Vigilanté is offered in two engagement models:
  - **On-Premise license Model**
    - Hosted on your servers
    - Investment in license of platform, SQL and related hardware
    - On-going AMC
  - **Software-as-a-Service / Cloud Model**
    - Hosted on our servers (third party reputed hosting companies)
    - No investment in software and hardware
    - Bundled annual usage fee

**Thank you for your time**

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