



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

Our goal - facilitate compliance

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 trading 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

- 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 pre-trade 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



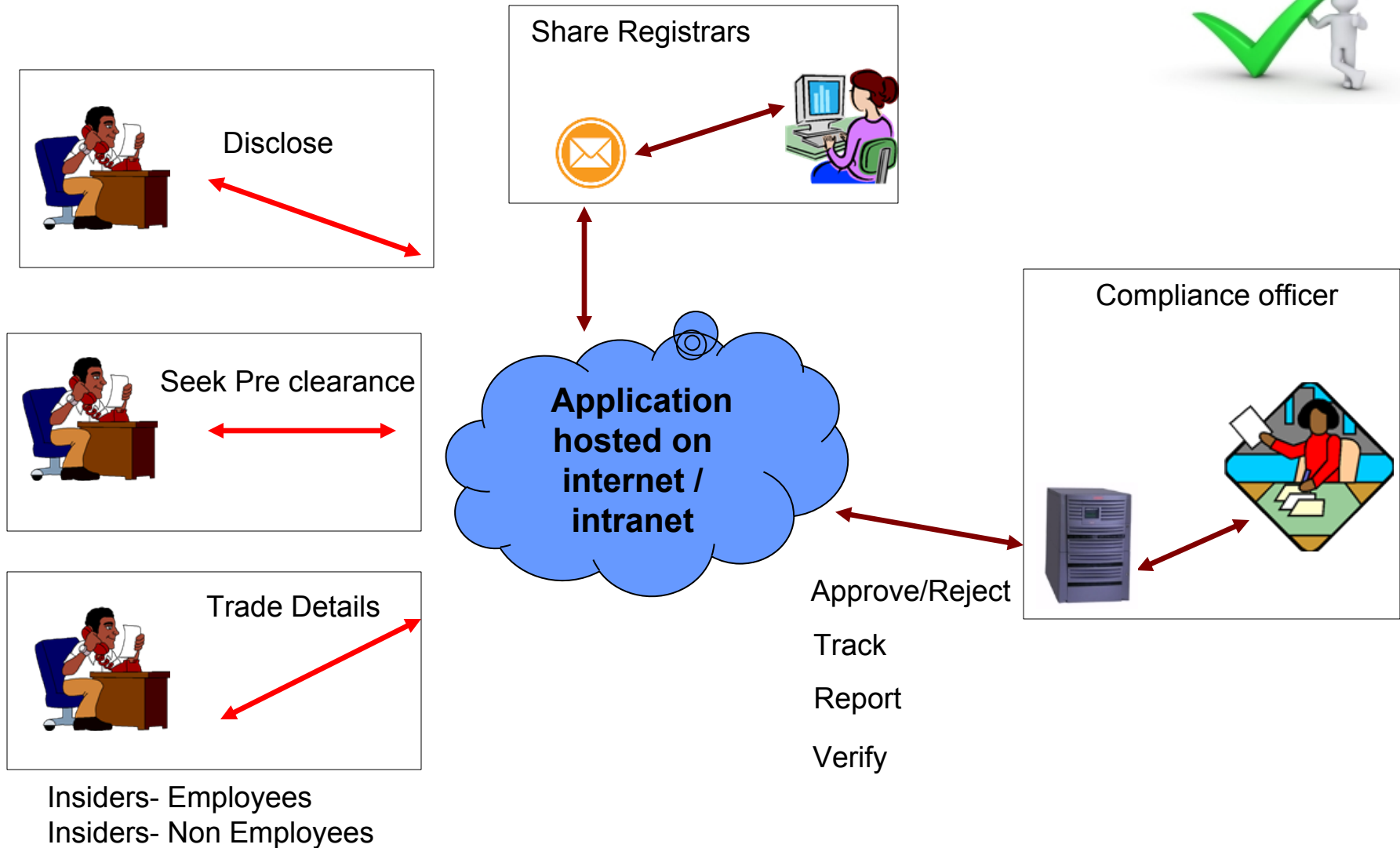
Your Insider radar

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

Disclosures

- Report to 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

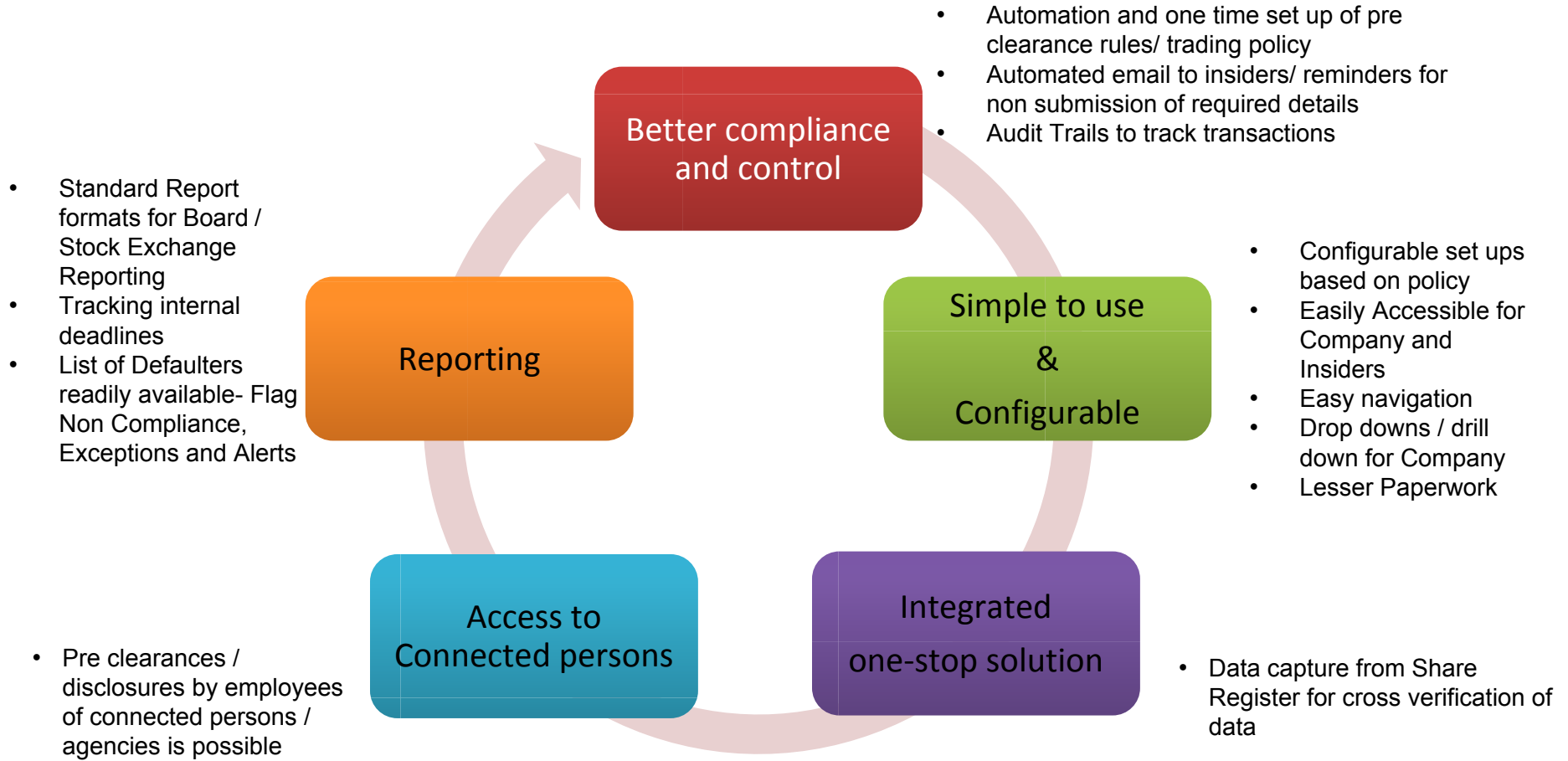
Grids and Label names : Configurable/ downloaded to Excel

Stock Exchange Reporting: In Prescribed formats

Dashboard: Pending Activities/ Transaction List



Benefits of using Vigilanté



Our goal - facilitate compliance



- Vigilanté is offered in three 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
 - **Managed Service (Outsourced Model)**
 - Hosted on our servers (third party reputed hosting companies)
 - No investment in software and hardware
 - One time set up fee & Annual usage fee

Thank you for your time

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