CODE OF CONDUCT FOR MCXCCL

VERSION 2.0



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DOCUMENT CONTROL PAGE

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Document Owner	**:**	**Mr. Mandar Kulkarni**	**30/05/2025**
Reviewed By	**:**	**Mr. Narendra Ahlawat**	**30/05/2025**
Approved By	**:**	**Board of Directors**	**28/06/2025**

Revision History

Version No.	Description	Prepared By / Revised By	Reviewed / Approved by	Issue / Revision Date
1.0	**Initial Version**	**Mr. Mandar Kulkarni**	**Reviewed by Mr. Narendra Kumar Ahlawat** **Approved by MCXCCL Board**	**25/08/2023** **(Effective from August 28, 2023)**
2.0	**Revised to include the following:** - In point (a) & (f), the word 'Board' is replaced with words 'Securities and Exchange Board of India'; -In point (f), the word 'Act' is replaced with words 'Securities Contracts (Regulation) Act, 1956' - In point (j), words 'the Company' is replaced with words 'any other stock exchange or clearing corporation'.	**Mr. Mandar Kulkarni**	**Reviewed by Mr. Narendra Kumar Ahlawat** **Approved by MCXCCL Board**	**28/06/2025**

CODE OF CONDUCT FOR MCXCCL

INTRODUCTION:

The purpose of this document is to implement a Code of Conduct for the Company in accordance with Securities Contracts (Regulation) (Stock Exchanges and Clearing Corporations) Regulations, 2018 read with Securities Contracts (Regulation) (Stock Exchanges and Clearing Corporations) (Amendment) Regulations, 2023.

This Code applies to Multi Commodity Exchange Clearing Corporation Limited (the Company).

The principles set forth in this Code are guiding in nature.

CODE OF CONDUCT FOR THE COMPANY:

The Company shall:

a) Always abide by the provisions of the Securities Contracts (Regulation) Act, 1956, Securities and Exchange Board of India Act, 1992, any Rules or Regulations framed thereunder, circulars, guidelines and any other directions issued by the Securities and Exchange Board of India from time to time.

b) Adopt appropriate due diligence measures.

c) Take effective measures to ensure implementation of risk management framework and good governance practices.

d) Take appropriate measures towards investor protection and education of investors.

e) Treat all its applicants or members in a fair and transparent manner.

f) Promptly inform the Securities and Exchange Board of India of violations of the provisions of the Securities Contracts (Regulation) Act, 1956, Securities and Exchange Board of India Act, 1992, rules, regulations, circulars, guidelines or any other directions by any of its members or issuer.

g) Take a proactive and responsible attitude towards safeguarding the interests of investors, integrity of the company's systems and the securities market.

h) Endeavour for introduction of best business practices amongst itself and its members.

i) Act in utmost good faith and shall avoid conflict of interest in the conduct of its functions.

j) Not indulge in unfair competition, which is likely to harm the interests of any other stock exchange or clearing corporation, their members or investors or is likely to place them in a disadvantageous position while competing for or executing any assignment.

k) Segregate roles and responsibilities of key management personnel within the Company including:

   i. Clearly mapping legal and regulatory duties to the concerned position
   ii. Defining delegation of powers to each position
   iii. Assigning regulatory, risk management and compliance aspects to business and support teams

l) Be responsible for the acts or omissions of its employees in respect of the conduct of its business.

m) Monitor the compliance of the rules and regulations by the members and shall further ensure that their conduct is in a manner that will safeguard the interest of investors and the securities market.

REVIEW:

The Policy shall be reviewed by the Regulatory Oversight Committee as and when required or at least once in 2 years and changes made therein, if any, shall be approved by the Board.