User Manual for InsiderQ

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1. Pre-Conditions

Hardware Requirements:

1. RAM: 8GB or above
2. CPU: i7 or above
3. SSD: 256GB or above
4. Windows 10 and above / Windows Server 2016 or above
5. Local Static IP - 1 (192.168.x.x)

Software Requirements (can be installed by us for an extra charge):

1. IIS
2. MySQL Community License
3. NodeJS

To Setup the server you need below files:

1. Database file
2. API build
3. UI Build

2. Introduction – InsiderQ

Insider Q- UPSI is a web-based UPSI Management platform which helps the compliance officer to centrally manage, track and follow up on all compliances and generate reports pertaining to UPSI.
Insider Q helps you to stay compliant with SEBI regulations and also Mitigate Insider Trading Risks by following the key process. It provides varieties of necessary reports to the compliance officer which makes the data accessibility easier.

3. Dashboard

- The Compliance Officer has the ability to see numerical statistics on the dashboard, including the total count of UPSI (Unpublished Price Sensitive Information) requests shared, the total count of trading requests made, the total count of Designated Persons, and the total count of Connected Persons.

The dashboard includes the following features:

- A bar graph displaying month-to-month statistics for both UPSI information shared and trading requests made. Users can change the time period (month or year) using a dropdown menu.

- A calendar highlighting dates associated with window closure allocations. Clicking on a highlighted date reveals window closure details for that specific date.

- Beneath the graph, there is a section presenting all UPSI information shared by users.

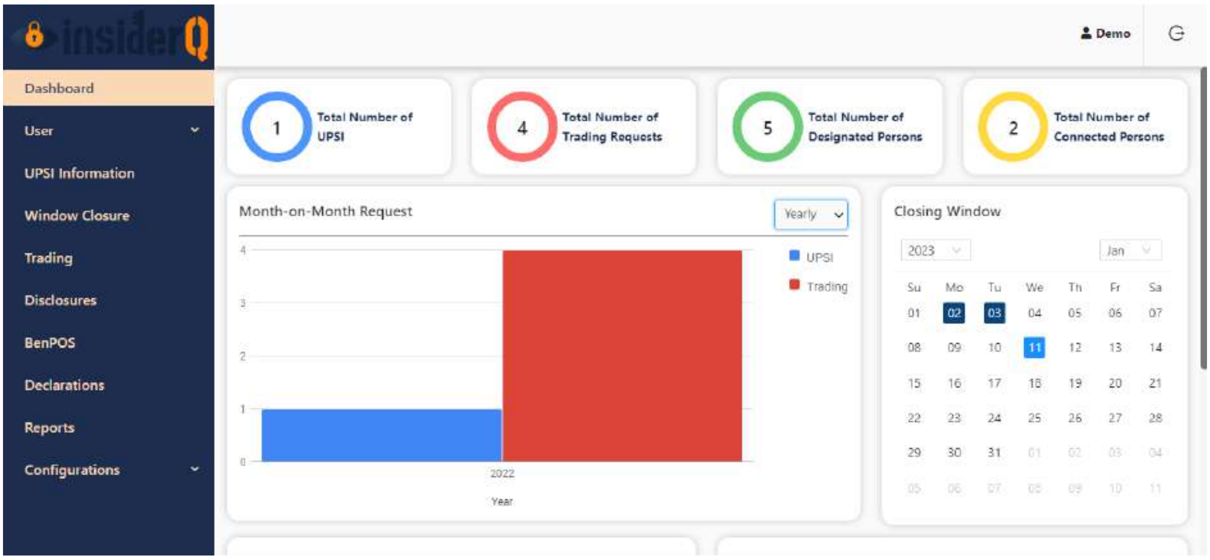
- Below the calendar, a section displays pending trading requests awaiting approval by the Compliance Officer (CO).

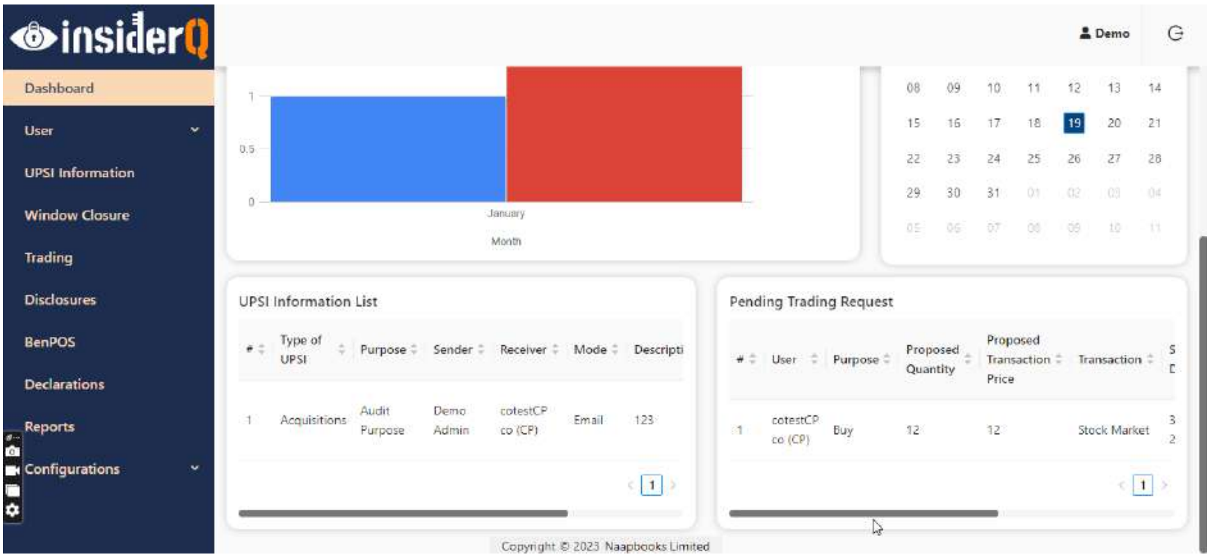
- The Compliance Officer (CO) has access to view all user data on the Dashboard.

- Designated Persons (DP) can view their own data on the Dashboard.

3.1 Dashboard View

Login to the app from CO or DP to view the Dashboard.





4. User Roles

1. Compliance Officer (CO)
   Company Secretary of the company shall be designated as the Compliance Officer who shall report to the Board of Directors of the company.

2. Designated Person (DP)

   The following class of persons will be treated as Designated Persons :
   (i) Promoters of the company
   (ii) All the Directors of the company and its material subsidiary
   (iii) Employees based on functional role and access to UPSI

3. Practicing Company Secretary (PCS)

   A Practicing Company Secretary (PCS) is a certified professional who ensures that companies comply with legal and regulatory requirements, especially related to corporate governance.

4. Connected Person (CP)

   Any person who is or has during the six months prior to the concerned act been associated with the company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price-sensitive information or is reasonably expected to allow such access.

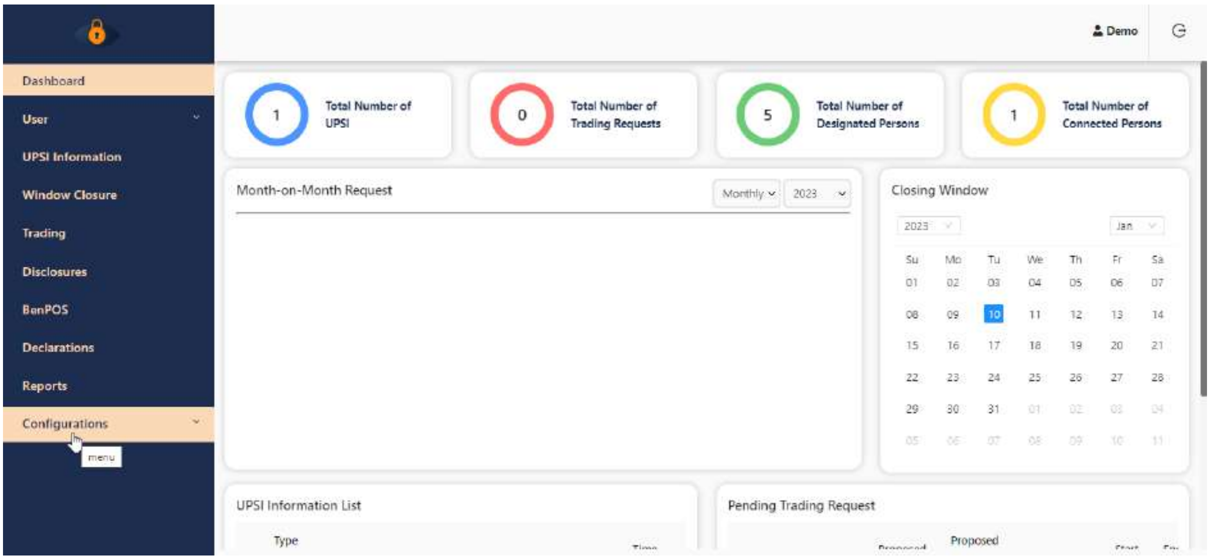
5. Access to the app for 1st time

- The first time the Compliance Officer (CO) accesses the app, they are required to configure the SMTP settings and provide company details.
- The total tradable quantity of the security must be entered into the database.

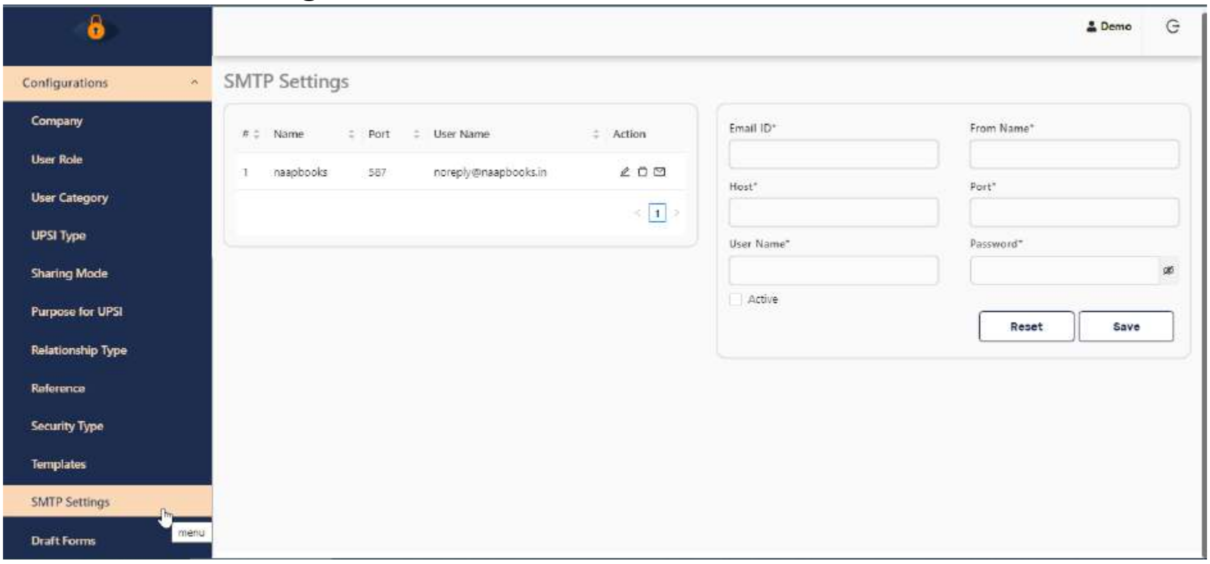
- When a user is initially added to the system, their ID's password needs to be recorded in the database. After the initial login, the user has the option to change their password.

5.1 SMTP Settings

On Homepage Sidebar>Click "Configurations".

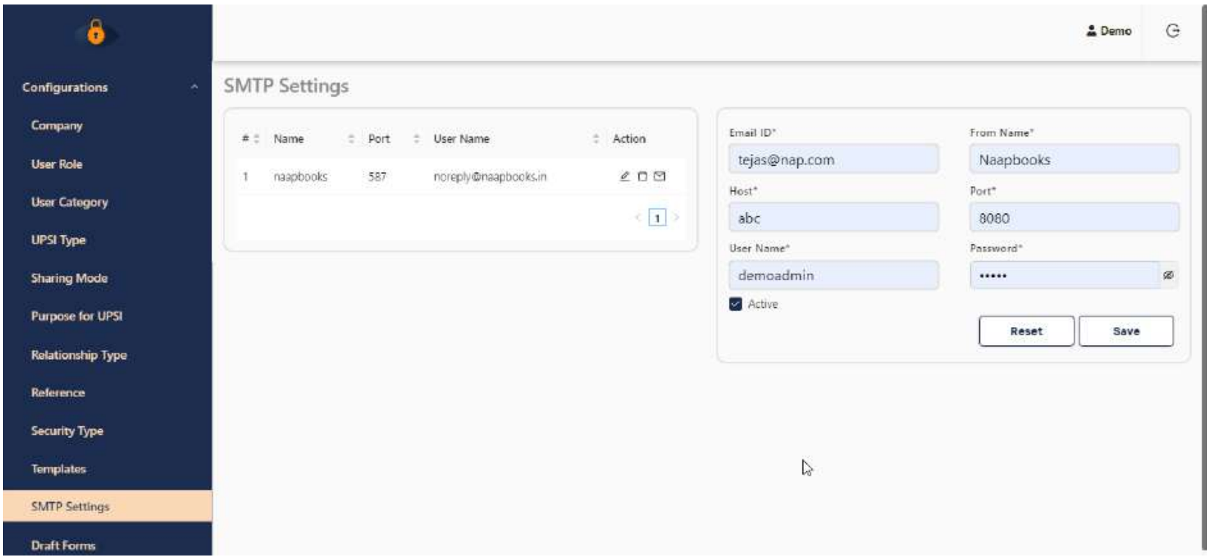


Click "SMTP Settings".



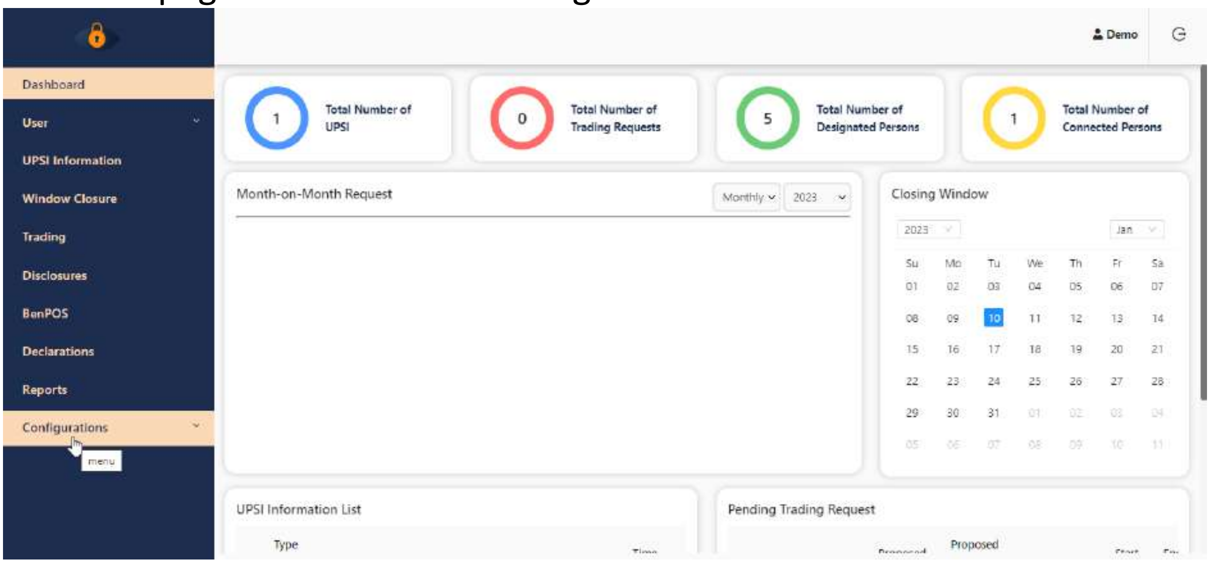
Click and fill data in "Email ID* From Name* Host* Port* User Name*

Password*, Check>Active, Click on Save.

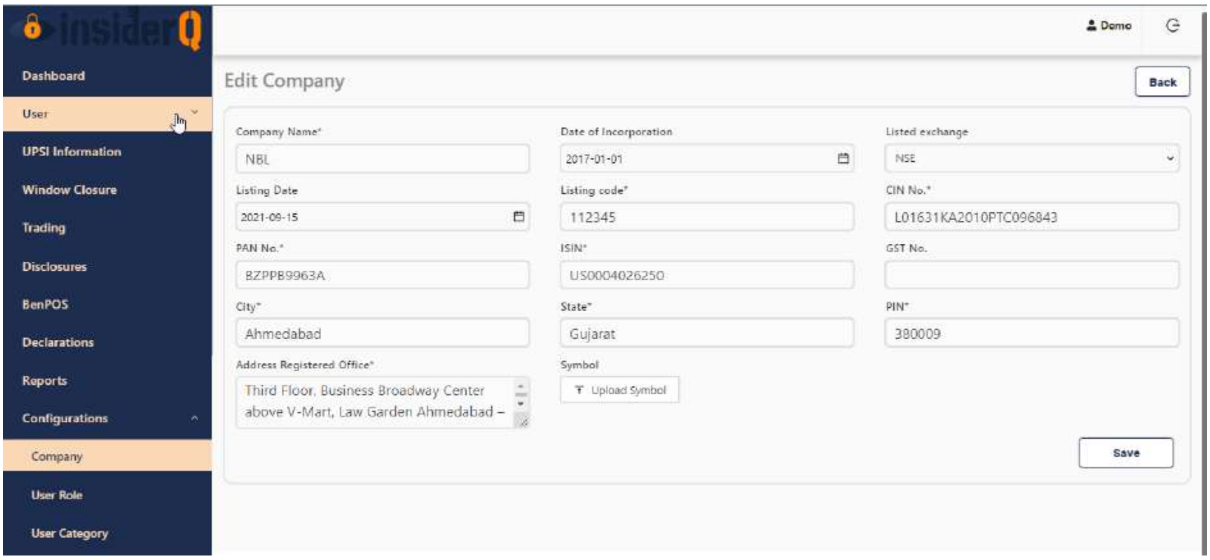


5.2 Setup of Company Profile

On Homepage Sidebar>Click "Configurations".



Click "Company>Add" and add all necessary information, then click "Save".



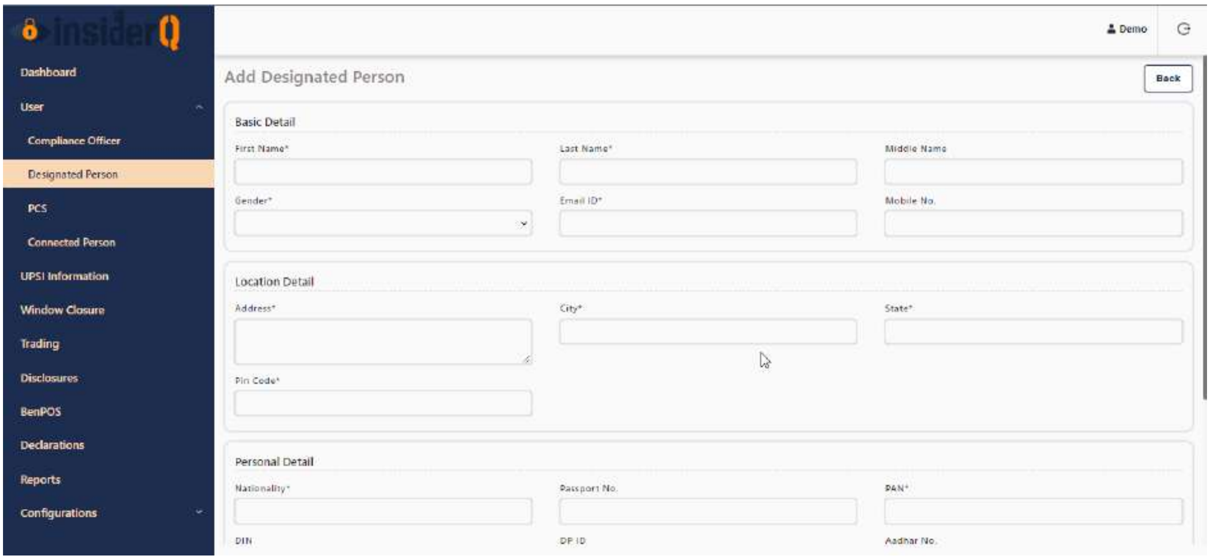
6. Adding Users

-The Compliance Officer (CO) has the capability to add Designated Persons (DPs) and Connected Persons (CPs). When inputting user details, CO must assign a unique username, which DP can use to log in from their respective IDs.

-Connected Persons (CP) do not have login IDs themselves. Designated Persons (DP) can add Connected Persons (CP) using their own login credentials.

6.1 Add user

On Homepage Sidebar>Click "User", Click on any User Category you want to add and click on the "Add" button.



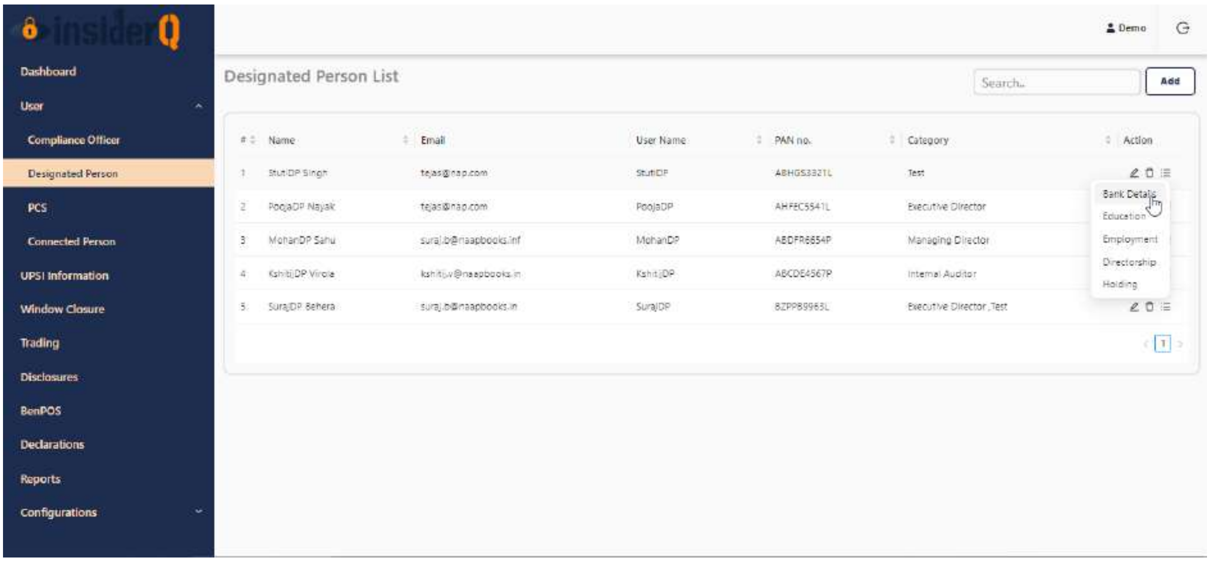
Input valid details on all the fields and click “Save”.

7. Add/Edit/Delete User Details

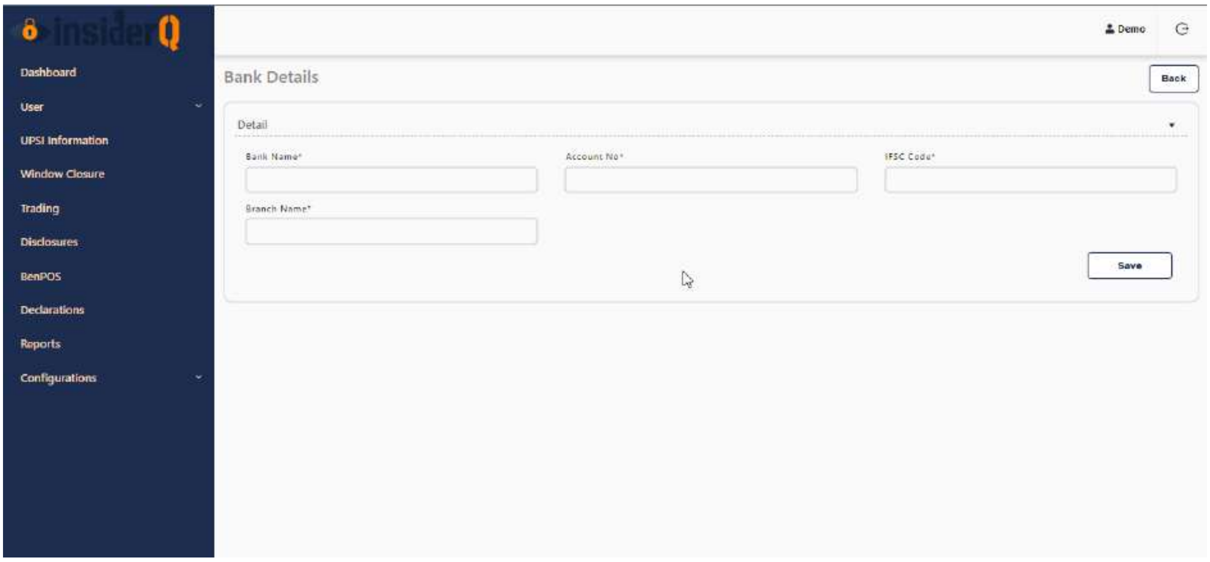
-The Compliance Officer (CO) has the ability to input Bank Details, Education, Employment, and Directorship information from their own login.
-Similarly, Designated Persons (DP) and Connected Persons (PCS) can also add the aforementioned details using their own login credentials.

7.1 Add User Details

On Homepage Sidebar>Click "User", Click on any “User Type” of whose data you want to add>From Action of respective user click the option in which you want to add data.



Click>Add, fill up necessary details and click “Save”.



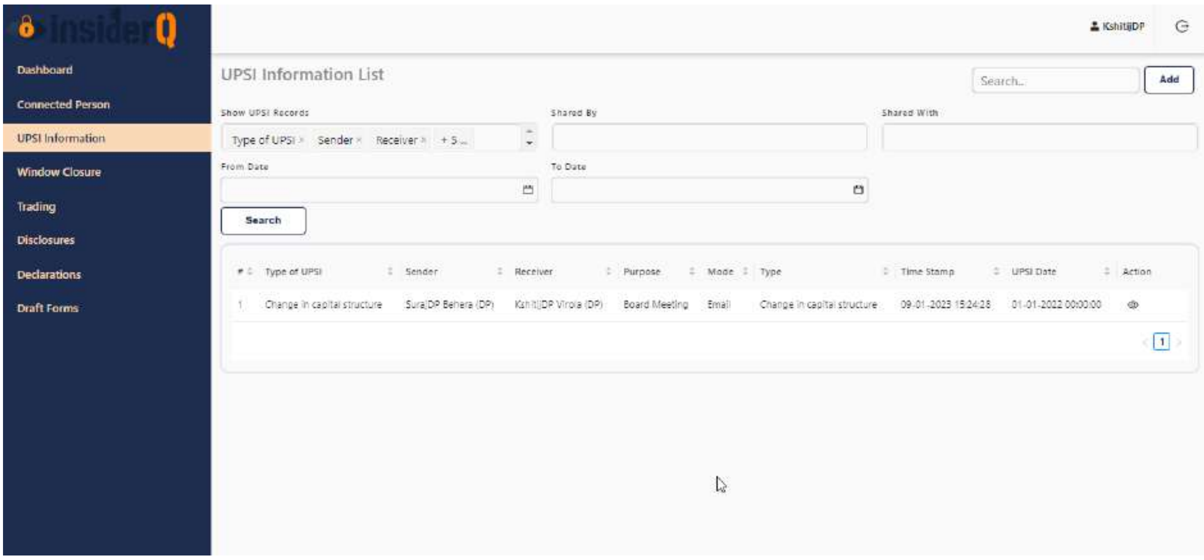
User can edit/delete data of users in the same way.

8. UPSI Information

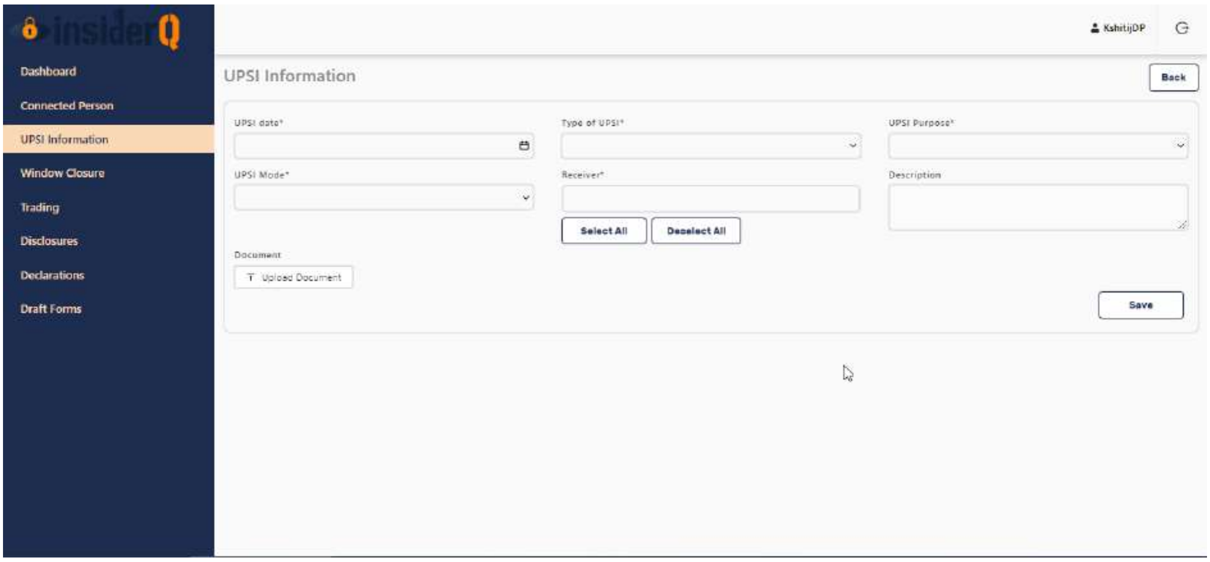
- UPSI information means any information, relating to the company or its securities, directly or indirectly, that are not generally available which upon becoming generally available, is likely to materially affect the price of the securities.
- Users have the ability to share UPSI information from their own login with other Designated Persons (DPs) and Connected Persons (CPs).
- UPSI information shared by Connected Persons (CPs) can be accessed through their respective connected Designated Persons' (DPs) IDs.
- Users can view UPSI information that they have shared from their own login.
- The Compliance Officer (CO) can view shared UPSI information and add closure details for users.

8.1 Add UPSI Information

On Homepage Sidebar>Click “UPSI Information”>Add to add any UPSI Information.



Fill in all necessary details, select the “Receiver” with whom you want to share the information>Upload any document if you want to share by Clicking on “Upload Document”>Click “Save”.



9. Window Closure

- The Designated Persons and their immediate relatives shall not deal in the securities of the company when the trading window is closed. The

Compliance Officer shall decide the period during which Trading Window shall be closed. Generally, the closure of Trading Window for securities of the company shall be announced when any of the following events occurs Declaration of Financial results

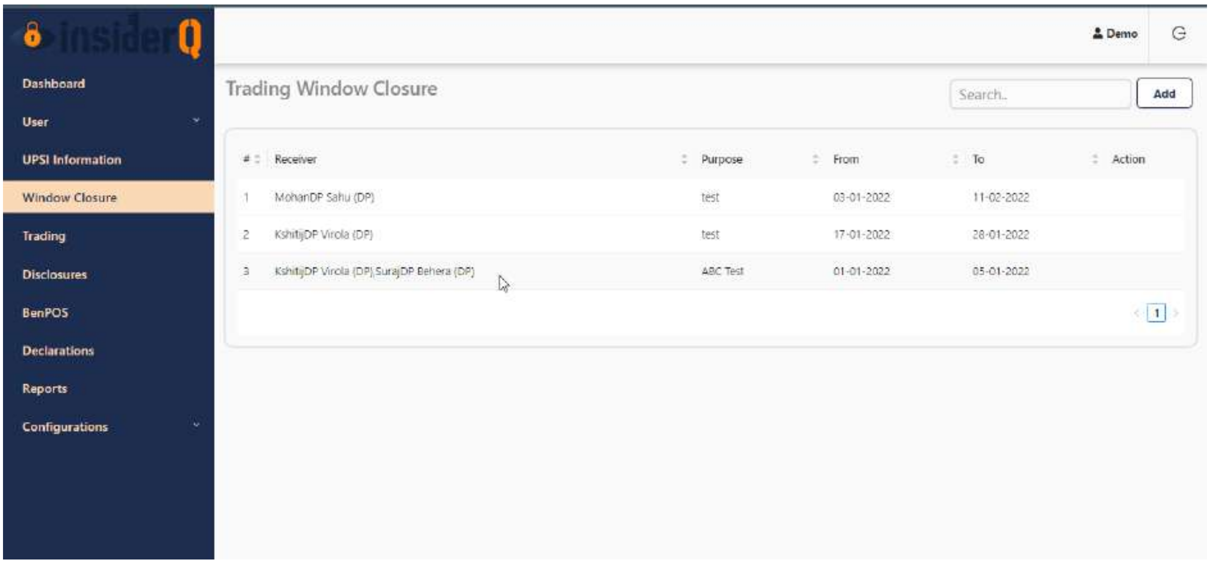
1. (quarterly, half-yearly and annual)
2. Declaration of dividends (interim and final)
3. Issue of securities by way of public/rights/bonus, etc.
4. Any major expansion plans or execution of new projects.
5. Any changes in policies, plans or operations of the company.

- The Compliance Officer (CO) is responsible for assigning window closures to Designated Persons (DPs) and Connected Persons (CPs).

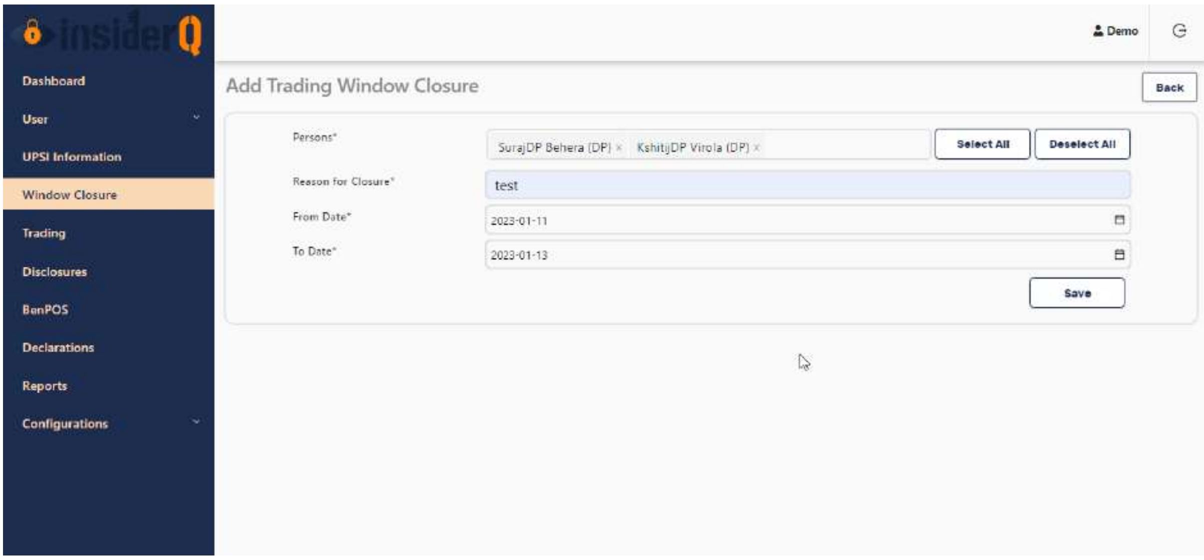
- During the window closure period, the individuals affected by it are prohibited from adding any Pre-Clearance requests or engaging in any trading activities involving the company's securities.

9.1 Add Window Closure

On the Homepage Sidebar>Click “Window Closure”> “Add”.



Fill in all the details and Click> “Save”.

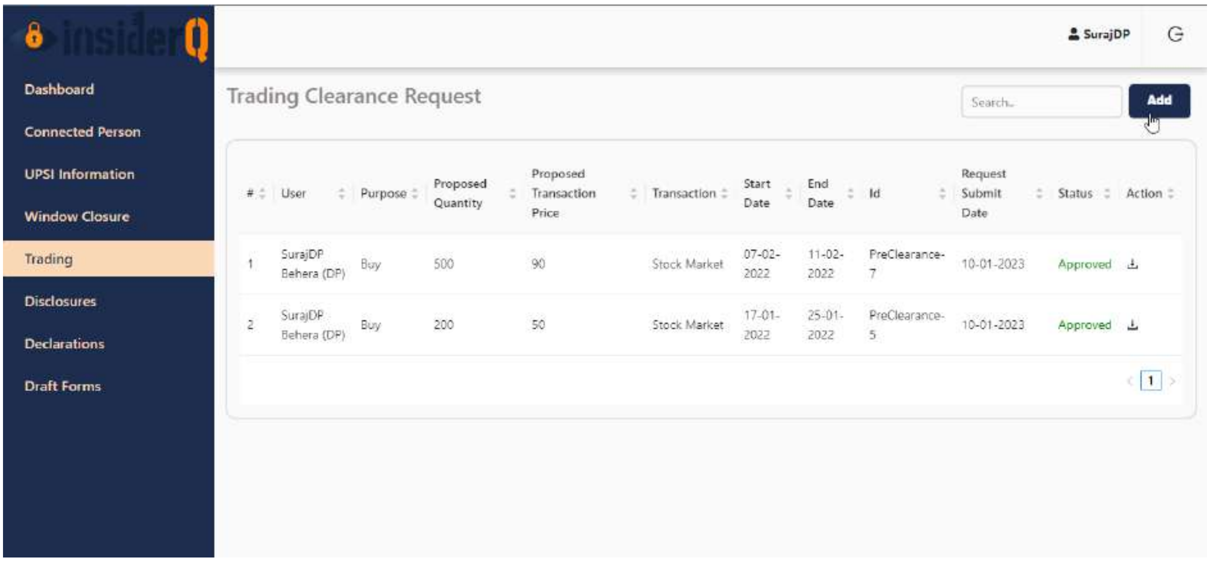


10. Trading

- Designated Persons and Connected Persons are permitted to engage in transactions involving the bank's securities only when the trading window is open, and the Designated Person does not possess any unpublished price-sensitive information.
- Before trading in the company's shares, a Designated Person (DP) is required to submit a Pre-Clearance Request, which must be approved by the Compliance Officer (CO).

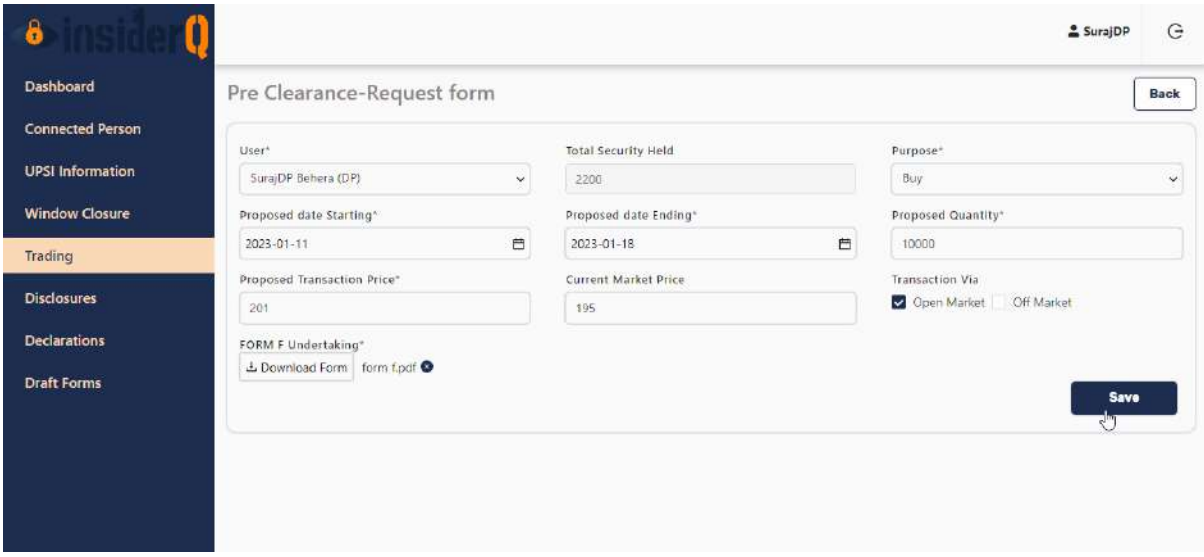
10.1 Add Pre Clearance Request

From DP Login Homepage Sidebar>Click “Trading”> “Add”.



On Pre Clearance Request screen DP has to sign and upload the “Form-F” undertaking.

- Fill in all the details and Click> “Save”.



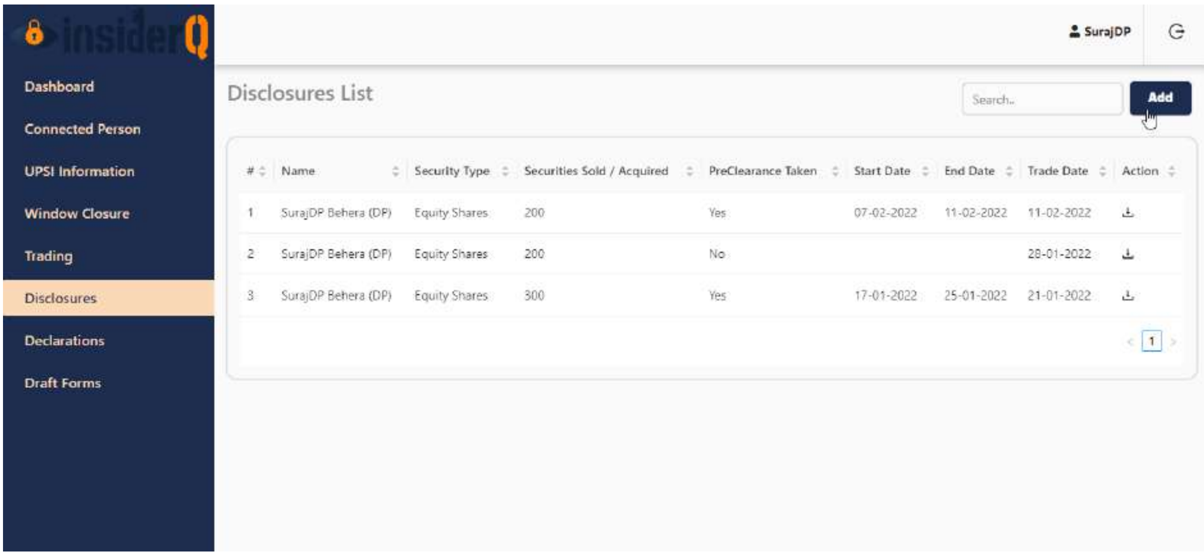
11. Disclosures

- Every Designated Person is obligated to provide a disclosure of their holdings in the company's securities, both in their name and in the name of their immediate relatives, in the designated Disclosure section.

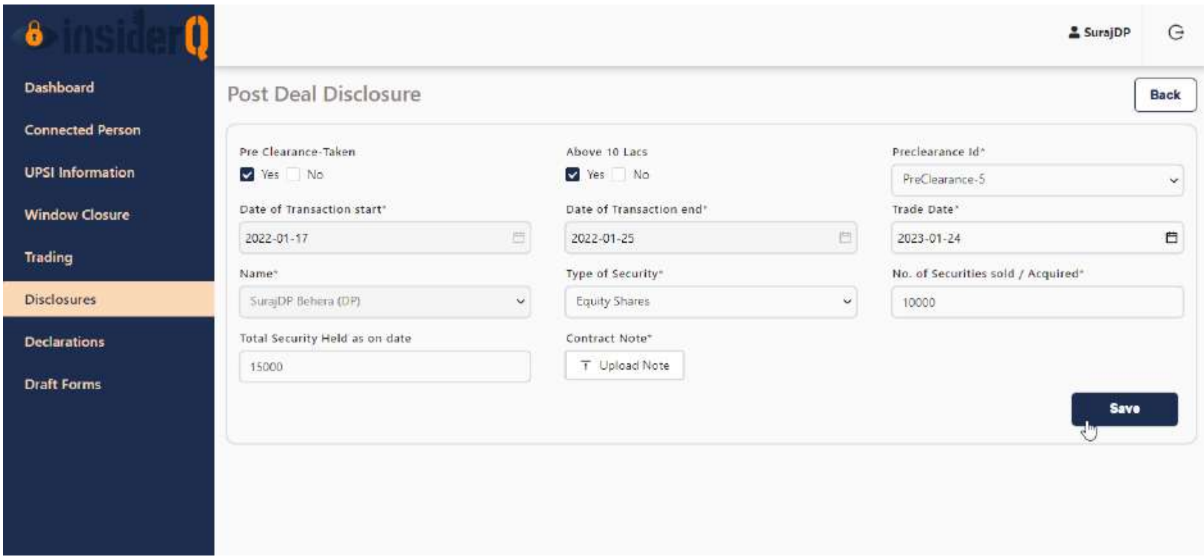
- Furthermore, following any trade, a Designated Person (DP) is required to include a "Post-Deal Disclosure."

11.1 Add Post Deal Disclosure

From DP Login Homepage Sidebar>Click “Disclosures”> “Add”.



Fill in all the details, upload the contract note and Click> “Save”.

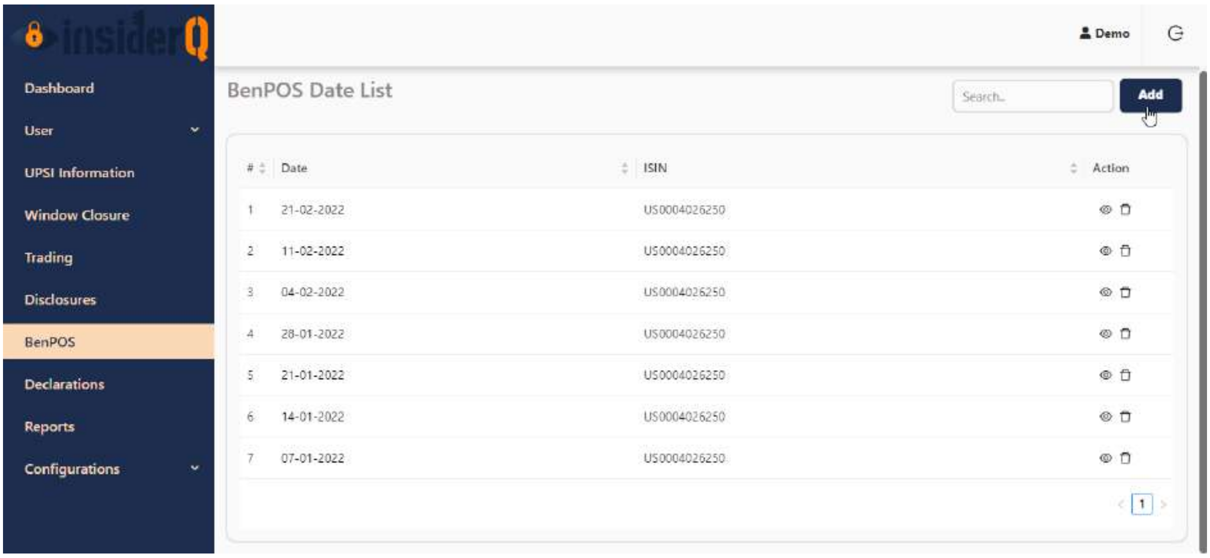


12. BenPOS

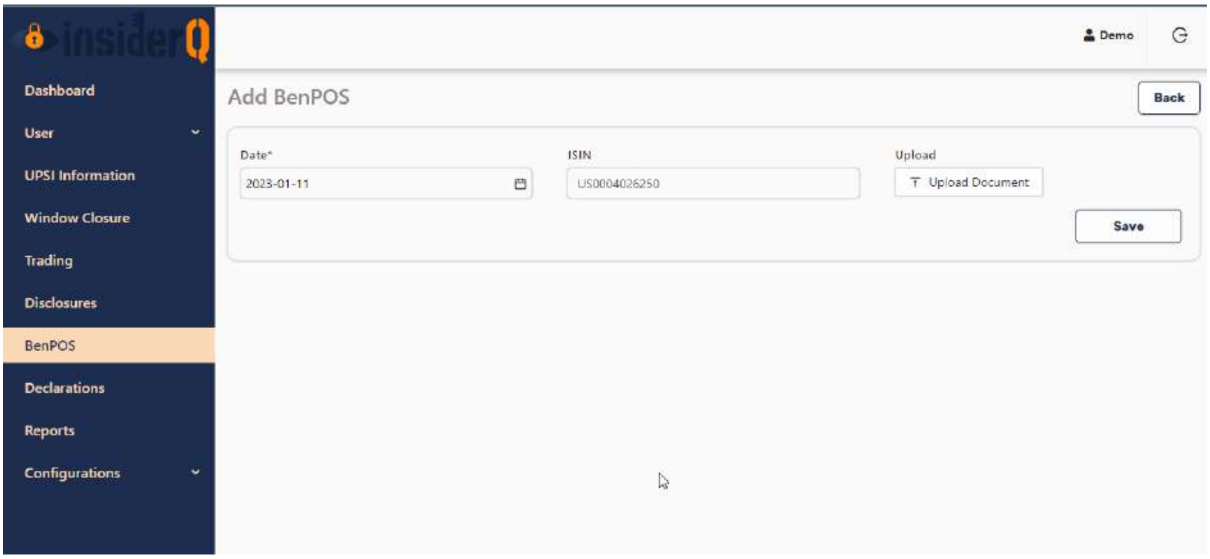
- Typically, on a weekly basis, the depositories supply BenPOS statements for download to all the registrars. The Compliance Officer (CO) is responsible for integrating these statements into the software.

12.1 Add BenPOS

From CO Login Homepage Sidebar>Click “BenPOS”> “Add”.



Fill in all the details, upload the BenPOS excel file and Click> “Save”.

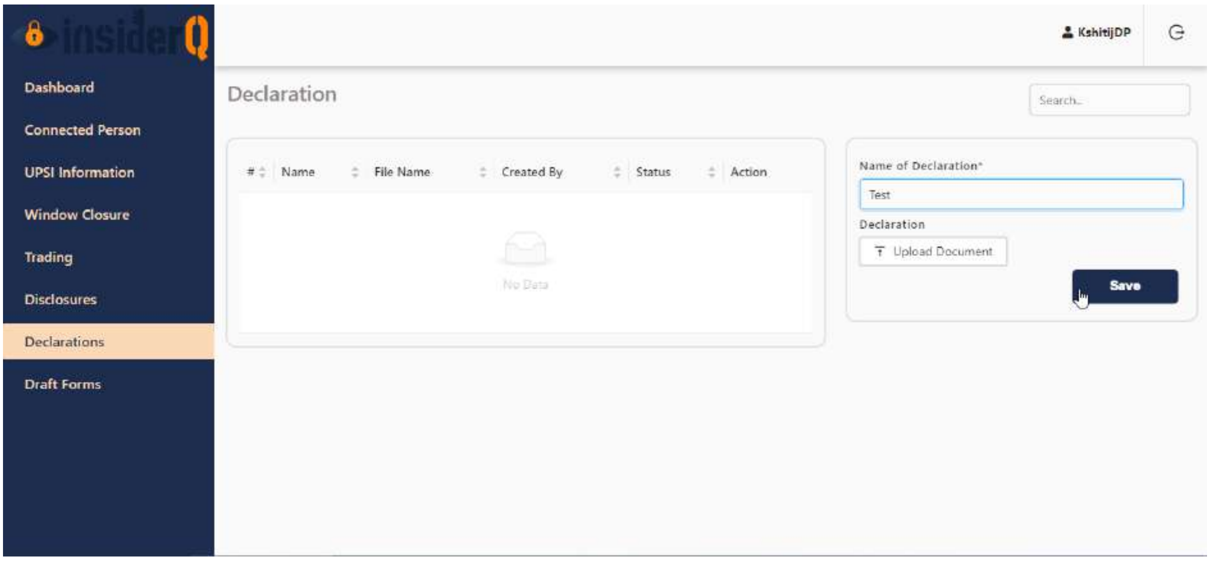


13. Declarations

- Designated Persons (DPs) have the ability to submit declarations, which must be approved by the Compliance Officer (CO).

13.1 Add Declaration

From DP Login Homepage Sidebar>Click "Declarations">Enter a valid name and upload the document>Click "Save".



14. Reports

- CO and PCS both can see all the reports.
- The following reports are available in the reports section of the app.

1. Designated Person-All the holding and Buying/Selling of DP's are Shown here.
2. Connected Person- All the holding and Buying/Selling of CP's are Shown here.
3. Deviation Report-It is of 3 types
   a. Contra Trade- "Contra Trade" means a trade or transaction which involves buying or selling any number of shares of the

Bank and within 6 months trading or transacting an opposite transaction involving sell or buy following the earlier transaction.

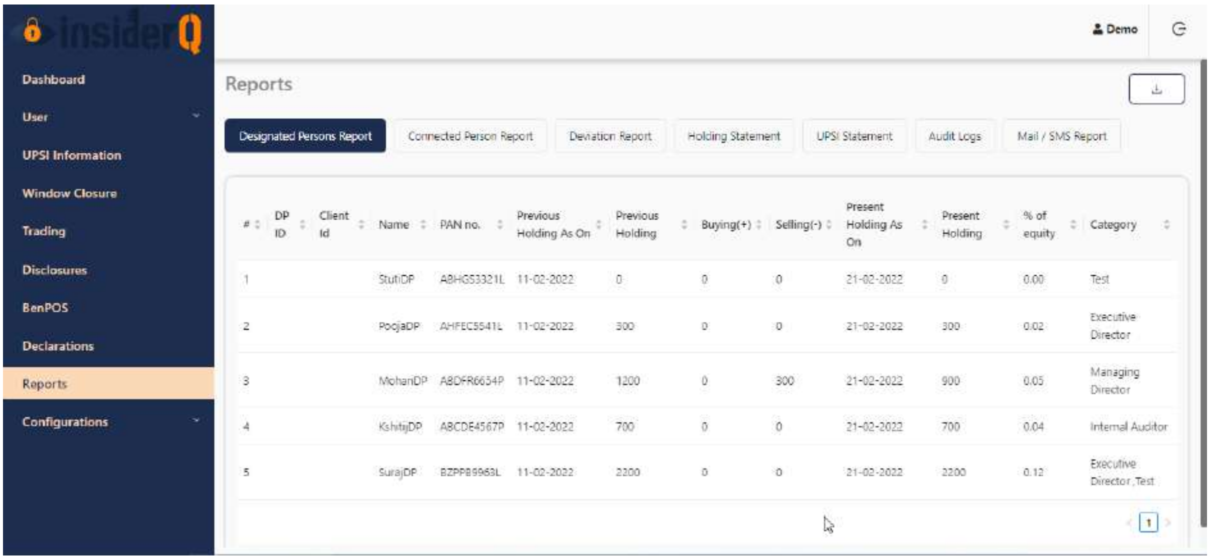
b. Pre-Clearance Violation- When any DP buys or sells any share without any pre-clearance, buys or sells more than the approved quantity of pre-clearance and buys any share other than the approved pre-clearance date that comes under Pre-Clearance violation.

c. Variation- When any DP buys or sells less than the approved trading quantity that comes under Variation.

4. Holding Statement-All the holding details of both DP and CP are shown here.
5. UPSI Statement-All the UPSI Information is shown here.
6. Audit Logs- All the activities made in the app are shown here.
7. Mail/SMS Report-All the emails sent from the app are shown here.

14.1 View Reports

From DP Login Homepage Sidebar>Click “Reports”.



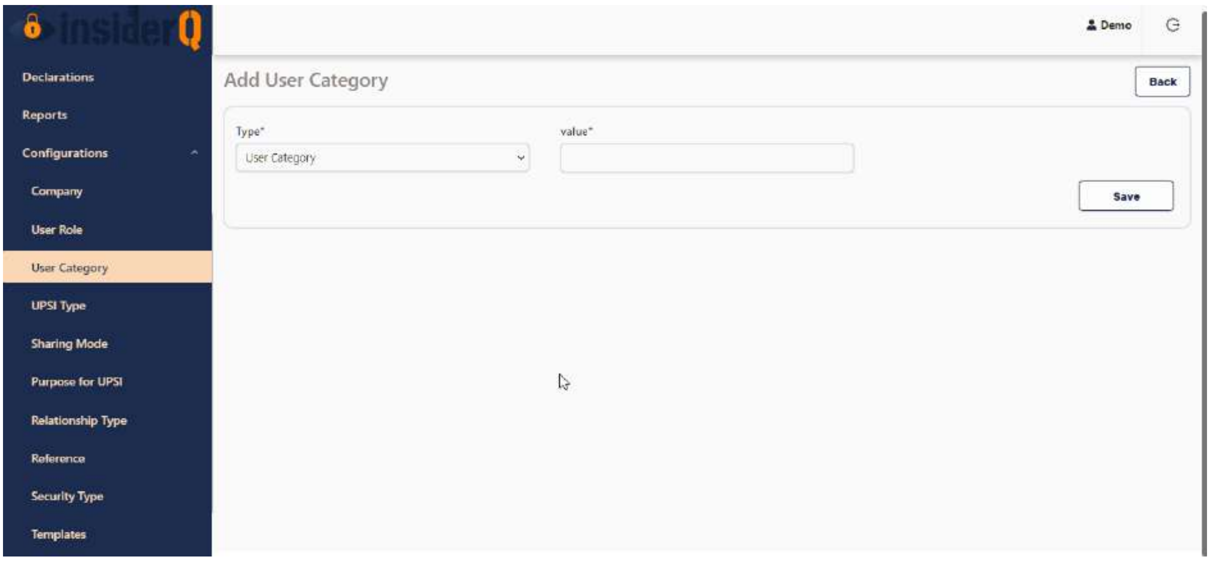
15. Configurations

- All the custom dropdown options can be added from configurations.
- CO can add custom dropdowns for

1. User Category
2. UPSI Type
3. Sharing Mode
4. Purpose For UPSI
5. Relationship Type
6. Reference
7. Security Type
8. Templates-For sending emails.
9. Draft Forms- To be used in the app for DP's to upload forms.

15.1 Add Custom Dropdowns

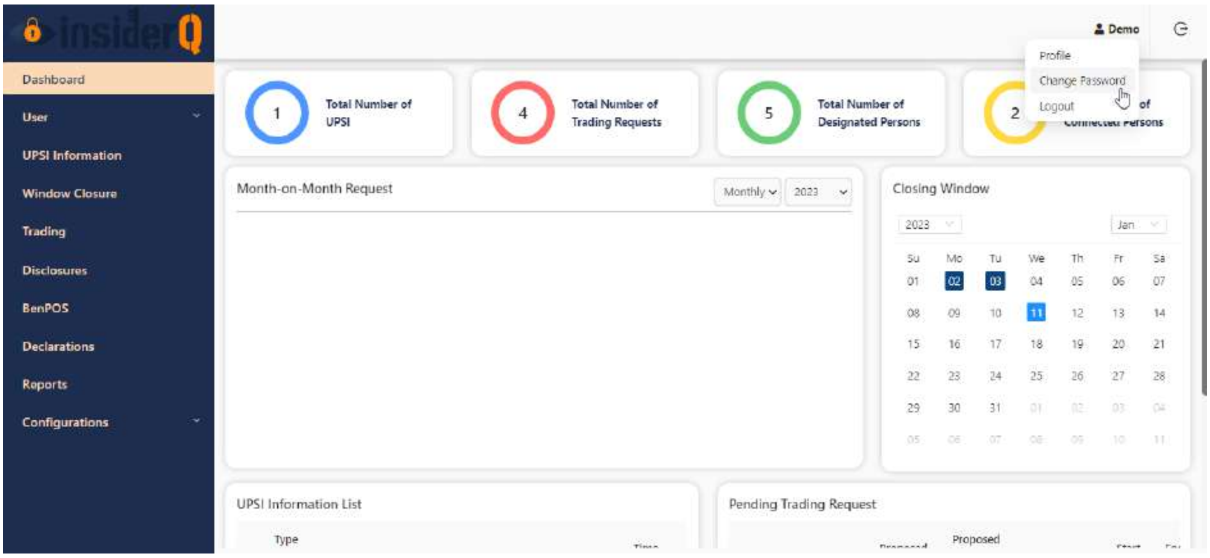
From CO Login Homepage Sidebar>Click "Configurations">Click any category in which you want to add a custom dropdown option.>Click "Add">Enter the Value>Click "Save".



16. Change Of Password

16.1 Change Password

From CO/DP/PCS Login Homepage Hover on “Profile Name”>Click “Change Password”.



Enter “Current Password”, “New Password”, “Confirm New Password”> Click “Save”.