

POLICY FOR UNAUTHENTIC NEWS CIRCULATION

The purpose of this policy is to Protect Investors by avoiding/restricting the unauthenticated news circulation related to various scrips by the Company's Employees/Temporary Staff or other dealing person and by company Infrastructure without adequate caution.

It has been observed that market news circulated through blogs/chat forums / email by employees without adequate caution can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms.

As per code of conduct for Stock Broker in SEBI (Stock Brokers and Sub- brokers) Regulations, 1992 and SEBI circular Cir/ISD/1/2011 dated March 23, 2011, all SEBI registered market intermediaries are required to have proper internal code of conduct to govern the conduct of its Employees. In view of same the company implements code of conduct for communicating through various modes of communication. Company Directors/ Officers / Employees/ Temporary Staff / Voluntary Workers are prohibited from:

1. Circulation of unauthenticated news related to various Scrips in blogs/chat forums/e-mail etc.
2. Encouraging or circulating rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
3. Either forwarding any market related news received in their official mail/personal mail/blog or in any other manner except after the same has been seen and approved by the Compliance Officer.

Therefore all the employees of the organization including Directors/ Officers / Employees/ Temporary Staff /Voluntary Workers should follow internal code of conduct and controls of the company. Employees/Temporary staff/ voluntary workers etc working in the office will not encourage or circulate and therefore restricted to circulate rumours or unverified information obtained from the client, industry and trade or any other sources without verification.

Access Control : There is no Access to chat forums/ Messenger sites to all the staff. Only senior officials including Directors, Compliance Officer and Manager have the access to the said. All the logs of such sites shall be treated as records and are maintained by the compliance officer.

Any information or market related news received by staff in official mail or their personal mail should be forwarded only after the same has been seen and approved by the Compliance Officer of the company.

If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for disciplinary action.

This code can be modified/amended/alterd as required from time to time in compliance of the relevant provisions/regulations in this regard .