

## **Policy on Code of Conduct**

**&**

### **Controls relating to**

### **Unauthenticated News**

### **Circulation**

#### **Objectives**

To protect investors from and to stop unauthenticated news circulation by the Employees / Staffs or other dealing person of **Ganesh Stockinvest Private Limited**.

#### **Regulation**

As per the 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 and FAQs issued by SEBI along with Circular bearing ref. No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2022/118 issued on Sept. 13, 2022 and earlier circulars issued in this regard, for responsible handling of unauthenticated market related news or rumors by SEBI Registered Intermediaries. The said circular is applicable to the Company. All SEBI registered market intermediaries are required to have proper internal codes of conduct to obstruct the market news circulation through blogs/chat forums/email by employees without adequate caution may cause considerable damage to the normal functioning and behavior of the market and distort the mechanisms thereof.

Therefore, all the employees of **Ganesh Stockinvest Private Limited** should follow internal codes of conduct and controls. Employees/staff etc. working in the office will not encourage or circulate rumours or unverified information obtained from the client, industry and trade or any other sources without verification.

#### **WHAT IS AUTHENTICATED NEWS?**

- News on any company/script would be said to be authenticated when such information has been:
- Disclosed/ confirmed by the Company through Stock Exchange/ SEBI or any other agency authorized to disseminate such information in its publication, in electronic form or otherwise.
- Reported in the Annual Report/prospectus/press release or any other official publication of the Company
- Disclosed in media i.e.

## **IMPLEMENTATION OF CODE OF CONDUCT**

In this regard, **Ganesh Stockinvest Private Limited** implements the codes of conduct for the various modes of communication. Company Directors/ Officers / Employees/ Staff etc. are prohibited from:-

- Circulating rumors or unverified information obtained from clients, industry, any trade or any other sources without verification.
- Circulation of unauthenticated news related to various Scripts in blogs/chat forums/e-mail, social networking sites etc.
- Forwarding any market related news received in their official mail/personal mail/blog except after the same has been seen and approved by the Compliance Officer. All the reporting with regard to violation of the same shall be done to the designated Compliance Officer.
- Circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.
- Access to Blogs/chat forums/messenger sites etc. has been restricted by **Ganesh Stockinvest Private Limited** and is not allowed.

## **ACCESS CONTROL**

There will be no access to chat forums/ Messenger sites to Employees/ staff excepts senior officials including Directors, Compliance Officer. All the logs of such sites shall be treated as records and are maintained by the IT deptt. Any information or market related news received by staff in official mail or their personal mail should be forwarded after seen and approved by the Compliance officer.

If an employee violated the provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for disciplinary action/ strict actions.

Where the Client has any grievances, he /she should promptly notify the same to our Compliance Officer in writing, mentioning sufficient details along with supporting documents to e-mail ID of the Compliance Officer and the grievances email ID. The complaint shall be analysed and redressed and replied to the client within 7 days/ sufficient time period from the date of the complaint with the resolution of the complaint.

## **RESTRICTED INTERNET USAGE**

The Company has restricted the access of private e-mails, chat forums/messengers, blogs, social networking websites etc. in office, unless otherwise permitted to specific individuals by the management. Such individuals irrevocably undertake that access to such sites will not be misused to the extent of facilitating unauthenticated news in any manner. The use of the official e-mail id for posting unauthenticated news in mail groups, forums, blogs etc. will attract disciplinary action. Further strict action would also be initiated against any employee representing the company in any manner whatsoever, who facilitates posting unauthenticated news during the non-business hours and outside the office premises.

## **CONSEQUENCES OF NON-COMPLIANCE**

- a) If an Employee fails to adhere to abovementioned requirements, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for actions by SEBI as well as the Company.
- b) Any action taken by the Company shall not preclude SEBI from taking any action separately in case of violation Breach of any of the requirements of the Policy shall be reported to the Top Management in order to determine the action to be taken in that regard. Such breaches may be reported to the Board of Directors or SEBI if required.

## **MONITORING AND REPORTING**

The compliance officer would be monitoring the policy from time to time in consultation with the management based on the guidelines of Regulators, Internal controls and the requirements of the business to safe guard the system.

## **REVIEW POLICY**

This policy may be reviewed by Compliance Officer / RMS Head / Authorized Personnel, in case any changes are introduced by any statutory authority or as and when it is found necessary to change on account of business needs or as per Risk Management Policy.

This policy is reviewed on 05.08.2024

## **DISCLAIMER NOTE**

Strictly Confidential - For Internal Communication / Dissemination purposes only. Unintended recipients of this document are prohibited from disseminating,

distributing, copying or using its contents. They should immediately destroy or notify the sender at email compliance@ganeshstock.in

We shall not be liable for any loss/damage caused by the usage of its content.

**For Ganesh Stockinvest Private Limited**

**Sd/-**

**Director**

\*\*\*\*\*

\*\*\*\*\*

\*\*\*\*\*