

POLICY FOR UNAUTHORIZED NEWS CIRCULATION & CODE OF CONDUCT

All the employees are responsible to conduct the company's business in accordance with the highest ethical standards, uphold the standards in day-to-day activities and comply with all applicable policies and procedures.

- **Ethical Behavior:** A strong personal sense of ethics should always play a significant role in guiding you towards a proper course of action. Employee's conduct should reflect positively on the company. If they have questions about whether certain actions are improper, or will reflect inappropriately on themselves or the company, they should seek guidance.

Use of honest and fair practices: Employees should always endeavour to deal fairly and in good faith with the company's customers, competitors, business partners, regulators, and their colleagues. It is our policy not to take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

- **Inside Information:** It is unlawful to trade in the securities of any company on the basis of material nonpublic (or inside) information or to disclose such information to others who may profit from it. Generally, material information is any information that an investor would likely consider important in deciding whether to buy, sell or hold securities or that could affect the market price of the securities. Examples include actual or estimated financial results or change in dividends; significant discoveries or product developments; possible mergers; acquisitions or divestitures; obtaining or losing significant contracts; and threatened major litigation or related developments. Employees are prohibited from disclosing inside information to anyone except those who have a need to know it in order to fulfill their responsibilities for the company and in accordance with company policy. They are also required to take steps to protect the confidentiality of inside information. If you have or receive information and are unsure whether it is within the definition of inside information contact the compliance officer prior to disclosing any such information.

- **Investment Recommendation and Advice to investors:** As a financial services company, we may be required to offer clients/investors investment guidance and recommendations from time to-time. Employees are not required to encourage or circulate rumours, any recommendation/advice or unverified information until it is only specified by the company's research department after appropriate approval from Compliance Officer. Any personal recommendation or view on the investment front (equity market or specific company related or any other investment related advice or outlook) should not be given to clients or any other investor. Their personal recommendation would be viewed by the investor as company's advice and the client's money may be at stake. If any employee is found to be giving personal recommendation under company's name, strict action will be taken and

may also lead to termination. The same is also applicable for all branches and their employees.

- **Access to Blogs/Chat forums/Messenger sites etc.** is either be restricted under supervision or access is not allowed.

- **Logs for any usage of such Blogs/Chat forums/Messenger sites** shall be treated as records and the same should be maintained as specified by the respective Regulations which govern the concerned intermediary.

"Where there is a conflict between ethics and business objectives, ethics must always come first."