

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 **TRADEWALK BROKING 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, 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 **TRADEWALK BROKING 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.

Implementation of code of Conduct

In this regard, **TRADEWALK BROKING PRIVATE LIMITED** implements the codes of conduct for the various modes of communication. Company Directors/ Officers / Employees/ Staff etc. are prohibited from:-

1. Circulating rumors or unverified information obtained from clients, industry, any trade or any other sources without verification.
2. Circulation of unauthenticated news related to various Scripts in blogs/chat forums/e-mail, social networking sites etc.

3. 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.

4. Circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.

5. Access to Blogs/chat forums/messenger sites etc. has been restricted by **TRADEWALK BROKING 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 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 analyzed 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.