



MADHUVAN SECURITIES PRIVATE LIMITED
Member of National Stock Exchange of India Limited
Member of National Securities Depository Limited
CIN: U67120GJ1995PTC024502
Regd. Office
82, Madhuvan, Opp. Hotel West End, Ellisbridge,
Ahmedabad-380 006
Tel : 079-68198992 Email : info@madhuvan.com

MADHUVAN SECURITIES PRIVATE LIMITED

POLICY ON PREVENTION OF CIRCULATION OF UNAUTHORIZED INFORMATION
BY STAFF

BACKGROUND

Pursuant to the SEBI Circular CIR/ISD/1/2011 dated March 23, 2011 issued circular on restriction on transmitting 'unauthenticated news' by stock brokering house and other SEBI registered intermediaries on blogs, chat forums, messenger sites in an effort to prevent stock manipulation through unverified news and rumors. Intermediaries need to have proper internal controls and ensure that proper checks and balances are in place to govern the conduct of their employees to prevent speculative news and rumors. The move follows growing concerns over some employees indulging into activities like fraud against the clients, front-running, circular trading and manipulating stock prices through rumor mongering. Market rumors can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms. Broking houses will also have to ensure that any market-related news received by their employees, either in their official or personal mail, should be forwarded to clients only after the same has been approved by its compliance officer.

MEANING

- Company : Company means 'Madhuvan Securities Private Limited'
- Employee : Employee means persons on the pay rolls of the Company includes persons employed on contractual basis.
- Unauthenticated news: Unauthenticated News means information which are not established or confirmed from reliable sources. The claims made by or about the subject may or may not be true.
- Blogs : Blogs are a type of website or part of a website wherein regular entries of commentary, descriptions of events, or other material such as graphics or video etc. are maintained and discussed in an interactive way



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Chat Forum: Chat forums or message board, is an online discussion site where people can hold conversations in the form of posted messages

Communication Channels: Communication Channels means a channel, whether electronic or otherwise, used to convey any market related information. For example, telephone/mobile phones, SMS, MMS, Blogs, Chat Forums, Messenger sites, Social Networking Sites and such other channels as may from time to time be used.

REPORTING:

Employee of the Company is obliged to promptly furnish any market related news/information received by him from an unverified source/communication channel to the Compliance Officer of the Company and shall forward the same only after the same has been approved by the Compliance Officer.

PROHIBITION

The Company implements code of conduct for communicating various modes of communication. Company's Director, Employee, Officers, Temporary Staff, voluntary workers and employees are prohibited from;

1. Circulation of unauthenticated news related to various Scrips in blogs/chatforums/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.

REVIEW

The Policy will review by the Board from time to time

Date: 09/04/2024
