

1. Preamble

ASNANI STOCK BROKER PRIVATE LIMITED, a SEBI-registered Depository Participant of Central Depository Services (India) Limited (CDSL) bearing **DP ID: 82000**, recognizes its responsibility to ensure integrity, transparency, and compliance in all forms of communication related to the securities market.

This Internal Code of Conduct and Controls (“Code”) is framed in accordance with applicable **SEBI Regulations, SEBI Circulars, and CDSL Operating Instructions**, to prevent the origination or circulation of unauthenticated, misleading, or unverified news and rumours that may influence investors or the securities market.

2. Objective

The objectives of this Code are to:

- Prevent circulation of unauthenticated or misleading market-related information.
- Establish internal controls and supervisory mechanisms over communication.
- Ensure employees act responsibly while sharing market-related information.
- Protect investor interest and maintain market integrity.
- Ensure compliance with SEBI and CDSL regulatory requirements.

3. Applicability

This Code shall apply to:

- All directors, officers, employees (permanent, temporary, contractual), trainees, and associates of the Company.
- All branches, offices, service locations, and remote working environments.
- All forms and modes of communication, whether official or personal, where such communication relates to securities markets, listed companies, or investor interests.

4. Definitions

4.1 Unauthenticated News

Any information, news, or report relating to securities, companies, or market movements which:

- Is not sourced from official or credible public sources such as Stock Exchanges, SEBI, Depositories, or listed companies; or
- Has not been verified or approved by the Compliance Officer prior to dissemination.

4.2 Modes of Communication

Includes but is not limited to:

- Emails, SMS, phone calls
- WhatsApp, Telegram, Signal or similar messaging platforms
- Social media platforms
- Blogs, forums, websites
- Any electronic or written communication

5. Code of Conduct

5.1 Prohibition on Circulation

No employee shall originate, circulate, forward, or publish any unauthenticated news, rumours, or misleading information relating to securities or the capital market through any mode of communication, whether official or personal.

5.2 Use of Official Communication Channels

All market-related communications intended for clients or the public shall be disseminated only through official channels of the Company and only after appropriate verification.

5.3 Personal Communication Responsibility

Employees shall ensure that their personal social media posts, messages, or discussions do not contain or promote any unauthenticated or misleading market-related information that may affect investors or the securities market.

6. Verification and Approval Process

- Any market-related news received from external sources and proposed to be shared must be forwarded to the **Compliance Officer**.
- The Compliance Officer shall verify such information with reliable and official sources before permitting dissemination.
- No employee shall interpret, modify, or add personal views to such information while communicating it further.

7. Access Control and System Measures

- The Company may implement suitable IT and administrative controls to monitor usage of official communication systems.

- Access to blogs, forums, or messaging platforms through official systems may be restricted or supervised where deemed necessary.
- Any misuse of official systems for spreading unauthenticated information shall be treated as a violation of this Code.

8. Compliance and Monitoring Mechanism

8.1 Role of Compliance Officer

The Compliance Officer shall be responsible for:

- Implementing and overseeing this Code;
- Advising employees on permissible communications;
- Monitoring adherence to SEBI and CDSL guidelines;
- Initiating corrective measures in case of violations.

8.2 Surveillance and Review

The Company shall maintain internal supervisory mechanisms to periodically review communication practices and ensure compliance with this Code.

9. Non-Compliance and Disciplinary Action

- Any breach of this Code shall attract appropriate disciplinary action, which may include warning, suspension, termination, or other action as decided by management.
- Regulatory action may also be initiated by SEBI or CDSL wherever applicable.

10. Escalation and Corrective Measures

Any instance of circulation of unauthenticated news detected shall be:

- Promptly escalated to senior management;
- Investigated internally; and
- Addressed through corrective and preventive actions to avoid recurrence.

11. Confidentiality

All internal reviews, investigations, and corrective actions under this Code shall be handled in a confidential manner, subject to regulatory disclosure requirements.

12. Review and Amendments

This Code shall be reviewed periodically and amended as and when required to align with changes in:

- SEBI Regulations / Circulars
- CDSL Operating Instructions
- Internal compliance requirements