Giriraj Stock Broking Private Limited

Unauthenticated News Circulation Policy

Policy created by	**Compliance Team**
Policy reviewed by	**Principal Officer**
Policy reviewed on	**30.09.2025**
Policy Approved by	**Board of Directors**
Policy approved on	**08.10.2025**

Version – 1.2

1. Prohibition on circulation of unauthenticated news

As per 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 code of conduct to govern the conduct of its Employees. In view of the same, we have implemented a code of conduct to regulate communication through various modes of communication. Employees are strictly prohibited from:

- ✓ Disseminating unauthenticated news related to various stocks through blogs, chat forums, emails, or any other communication channels.
- ✓ Endorsing or circulating rumors or unverified information obtained from clients, industries, trades, or any other sources without proper verification.
- ✓ Forwarding any market-related news received via official mail, personal mail, blogs, or any other means, unless it has been reviewed and approved by the Compliance Officer.

Illustrative list of Reliable Sources includes Information posted on websites of Government/Regulatory authorities, print media and their websites, Business News Channels and such information which are communicated by the Corporates by way of press release.

Employees must obtain prior approval from the designated Compliance Officer before forwarding any market-related news received via their official mail, personal mail, blog, or any other means. All reports concerning violations of this policy must be submitted to the designated Compliance Officer. Failure to seek approval will be considered a violation of the various provisions contained in the SEBI Act/Rules/Regulations, etc. Such violations shall be subject to disciplinary action in accordance with company policies and may also incur legal consequences under applicable regulations. It is imperative for employees to adhere to these guidelines to maintain compliance with regulatory requirements and uphold the highest standards of ethical conduct within the organization. Any employee of the Company who fails to observe the provisions of this policy shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for penal action.

Nothing contained in this clause shall prevent the Company/ Management/ Compliance Officer to take appropriate action against such employee for breach of duty. The Compliance Officer of the company shall take all prudent steps to identify and restrict any act that may lead to violation of this policy.

Change in the Policy will be adopted as and when required by the company and is binding on all the Staff/Employees/and Directors of the Company.

For Giriraj Stock Broking Pvt Ltd,