

POLICY FOR PREVENTION REGARDING UNAUTHENTICATED NEWS CIRCULATION

Preface

SEBI has vide its circular dated March 23, 2011 has expressed concern over spreading of market rumours by Stock-brokers of brokerage firms, sub-brokers etc. It has further stated that spreading of unauthenticated news and rumors etc. can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms. The damage which can be caused by circulation of unauthenticated news or rumors is enormous.

SEBI has given various directions in this regard as mentioned below:

- Proper internal code of conduct and controls should be put in place.
- Sub-brokers/temporary staff/voluntary workers etc. employed/working in the offices of market intermediaries do not encourage or circulate rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
- Access to Blogs / Chat forums / Messenger sites etc. Should either be restricted under supervision or access should not be allowed.
- Logs for any usage of such Blogs / Chat forums / Messenger sites (called by any nomenclature) shall be treated as records and the same should be maintained as specified by the respective Regulations which govern the concerned intermediary.
- Sub-brokers should be directed that any market related news received by them either in their official mail/personal mail/ blog or in any other manner, should be forwarded only after the same has been seen and approved by the concerned Intermediary's Compliance Officer.

SCOPE

All Employees, Staff, sub-brokers including franchisees, remisiers, authorized persons have to abide by this code of conduct.

CODE OF CONDUCT

- OIPL code of conduct lays down various measures to prevent spreading of unauthenticated stock specific news, information or market rumors etc. that may damage the normal functioning of the market or disturb the market equilibrium.
- No Employee/Staff/AP/Remisier shall circulate in any physical or electronic form through any official or personal mode any unauthenticated stock specific news, information or market rumors etc. OBSIDIAN INVESTMENT PRIVATE LIMITED received/obtained from client, industry, any trade or any other sources that may damage the normal functioning of the market or disturb the market equilibrium without explicit written approval of the authorized person.
- Price sensitive information means any information which relates directly or indirectly to a company and which if published is likely to materially affect the price of securities of company.

The following shall be deemed to be price sensitive information:

601/605, HET DIV SQUARE, BEHIND HOTEL MARRIOT, SINDHU BHAVAN ROAD, BODAKDEV AHMEDABAD 380054

Contact : +91 9737222149 E-mail : admin@obsidiancapital.in

CIN: U64990GJ2025PTC162598

- Periodical financial results of the company;
 - Intended declaration of dividends (both interim and final);
 - Issue of securities or buy-back of securities;
 - Any major expansion plans or execution of new projects;
 - Amalgamation, mergers or takeovers;
 - Disposal of the whole or substantial part of the undertaking;
 - Any significant changes in policies, plans or operations of the company.
- Unpublished means information which is not published by the company or its agents and is not specific in nature. Explanation: Speculative reports in print or electronic media shall not be considered as published information.
 - The modes of circulation include but are not restricted to personal conversation, telephone call, fax, letter, sms, e-mail, blogs, chat forums, social networking sites etc.
 - Any information that is proposed to be circulated should be backed by OIPL research data, the records of which should be retrievable.
 - All e-mails containing any unauthenticated information should contain a disclaimer. This disclaimer should not be changed in any case unless communicated by OIPL to do so.
 - Any advertisement, visiting cards or any other collateral through any print or electronic media needs to be approved by OIPL before being released. This includes but is not restricted to advertisements through newspaper, leaflets, pamphlets, stickers, banners, hoardings, posters, TV, radio, websites etc. Please refer to Annexure B for the process of getting, visiting cards/advertisements/collaterals approval.
 - Any Employee/Staff/AP/Remisier having his/her website/ social networking ID needs to sign a declaration. Those sub-brokers who do not have websites/social networking IDs as of now but plan to launch the website/create a social networking ID in future need an approval from OIPL before doing so.
 - Any violation of the Code of Conduct would constitute an act of misconduct which may result in disciplinary action, up to and including termination of agreement/employment.
 - Violations of the Code of Conduct may also constitute violations of law and may result in prosecution by regulatory authorities
 - Employee/Staff/AP/Remisier who suspects violations of the letter or spirit of the above code have an obligation to report their concerns to the designated Compliance Officer.
 - If you have any questions regarding the best course of action in a particular situation, you should promptly contact the Compliance Officer.
 - This Code of Conduct will be reviewed every year or as and when needed by a panel consisting of Management Committee members and the Compliance Officer
 - Kindly ensure that "No advertisement/collateral shall be released unless an approval is received from the respective Exchanges."

This Code of Conduct is approved by the Management Committee and comes into force with immediate effect. The Policy will be subject to review at least every year or as needed to ensure that it reflects



developments in the market and best practices, taking into account the changing business and regulatory environment.

This Code of Conduct will be reviewed every year or as and when needed by a panel consisting of Management Committee members and the Compliance Officer. In case of any ambiguity over interpretation of this document, the Compliance Officer's views will be considered final and binding on all employees.

ANNEXURE A

Disclaimer: This e-mail (including any attachments to it) may contain confidential, proprietary or privileged information and is intended solely for the addressees. Unauthorized disclosure, use, dissemination or copying (either whole or partial) of this email, or any information it contains, is prohibited. If you are not the intended recipient of this e-mail, please delete it immediately from your system and notify the sender of the wrong delivery and the mail deletion. Internet communications may not be secure or error free as information could be intercepted, susceptible to alteration, corrupted, lost, destroyed, may arrive late or be incomplete, or may contain viruses etc. Neither the sender nor any of its associates accepts any liability for any errors or omissions in the contents of this message, and shall have no liability for any loss or damage suffered by the user, which may arise as a result of such e-mail transmission. The contents of this message do not necessarily represent our views or policies. This e-mail does not contain any professional advice and does not constitute an offer regarding any financial or other service towards the addressee.

We do not accept responsibility for any loss arising from unauthorised access to, or interference with, any Internet communications by any third party. Replies to this e-mail may be monitored by us for operational or business reasons. Any opinion or other information in this e-mail or its attachments that does not relate to our business is personal to the sender and is not given or endorsed by us. OIPL or their group companies are in no way responsible for same.

ANNEXURE-B

Prior approval for publication of Advertisements/Collaterals

It should be noted that prior approval is required to be obtained from the exchanges through OIPL for publication of advertisements. Prior approval of the respective exchanges through the OIPL is required to be obtained before releasing any advertisements/collaterals. The sub-broker/AP/Remisier etc shall be required to forward the request for releasing an advertisement/ collateral along with the content of the proposed advertisement/collateral to Compliance officer in OIPL.



Obsidian

Obsidian Investment Private Limited

Kindly ensure that "No social networking ID/website should be launched unless an approval is received from OIPL."