

POLICY ON CODE OF CONDUCT & CONTROLS RELATING TO UNAUTHENTICATED NEWS CIRCULATION TRUSTLINE SECURITIES LIMITED

INTRODUCTION

SEBI Circular No. Cir/ ISD/1/2011 dated March 23, 2011 titled "Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication" and addendum to the said circular dated March 24, 2011 and FAQs issued by SEBI alongwith Circular bearing ref. No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2022/118 issued on Sept. 13, 2022 and earlier circulars issued in this regard, for responsible handling of unauthenticated market related news or rumors by SEBI Registered Intermediaries. Trustline Securities Limited (hereafter referred as 'TSL' or 'the Company') is a Registered Trading Member and the said circular is applicable to the Company.

OBJECTIVE & SCOPE

Employees of the Company especially those who have access to market information viz. Sales Team, Dealers, Research Analyst, Equity/ Portfolio Advisors etc. shall not encourage or circulate rumours or unverified information obtained from client, industry, any trade or any other source without verification. Employees shall circulate only that information which is received from reliable sources only. If the source of the information is not verifiable, then such information may be used only after its use is approved by the Compliance Officer of the Company.

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.

WHAT IS UNAUTHENTICATED MARKET RELATED NEWS?

Unauthenticated market related news or rumours may be defined as "***information or news or talk or opinion widely disseminated with no discernible source or a statement or report without known authority for its truth***"

WHAT IS AUTHENTICATED NEWS?

- With reference to the definition above, news on any company/ scrip would be said to be authenticated when such information has been:
- Disclosed/ confirmed by the Company through Stock Exchange/ SEBI or any other agency authorized to disseminate such information in its publication, in electronic form or otherwise.
- Reported in the Annual Report/prospectus/press release or any other official publication of the Company
- Disclosed in media i.e. press report, television report, websites along with source of information and reports

ACCEPTABLE PRACTICES AND PROCESS

No employee or intermediary related thereto shall circulate any market related information/ news/ market buzz/ rumor or unverified information (information which is not authentic as defined above), at any time without verification, to clients or any other person through phone, SMS, email (personal or official), blog or any other mode of communication. Opinions/views etc. expressed by employees would not be considered as unauthenticated news provided the opinion has a demonstrable and rational basis and be clearly stated as the opinion of the author.

Hence, any market news that can be circulated should either be authentic as defined above or should be the opinion of the employee. In case of any need for clarification whether any particular news is authentic or not for further dissemination, the employees must seek approval of their supervisor/head of department / Management followed by an approval from Compliance Officer on email along with the backups available on the news. E-mail seeking approval in this regard needs to be sent to the Compliance Officer. If any market related news, whether authentic or unauthentic which is received by employees in their personal/ official mail or blog or any other manner, same can be forwarded in writing (mail/blog etc.) to anyone, only after approval of their supervisor/head of department followed by an approval from the Compliance Officer or by the Management (as decided time to time).

RESTRICTED INTERNET USAGE

The Company has restricted the access of private e-mails, chat forums/messengers, blogs, social networking websites etc. in office, unless otherwise permitted to specific individuals by the management. Such individuals irrevocably undertake that access to such sites will not be misused to the extent of facilitating unauthenticated news in any manner. The use of the official e-mail id for posting unauthenticated news in mail groups, forums, blogs etc. will attract disciplinary action. Further strict action would also be initiated against any employee representing the company in any manner whatsoever, who facilitates posting unauthenticated news during the non-business hours and outside the office premises.

CONSEQUENCES OF NON COMPLIANCE

- a) If an Employee fails to adhere to abovementioned requirements, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for actions by SEBI as well as the Company.
- b) Any action taken by the Company shall not preclude SEBI from taking any action separately in case of violation Breach of any of the requirements of the Policy shall be reported to the Top Management in order to determine the action to be taken in that regard. Such breaches may be reported to the Board of Directors or SEBI if required.

MONITORING AND REPORTING

The compliance officer would be monitoring the policy from time to time in consultation with the management based on the guidelines of Regulators, Internal controls and the requirements of the business to safe guard the system.

APPROVAL AUTHORITY

This surveillance policy is as approved by the Board of Directors at its Board Meeting on 24/04/2022.

INTIMATION:

On best effort basis, clients will be notified of same, as the same shall be updated on the website of the Company.

REVIEW POLICY

This policy may be reviewed by Compliance Officer / RMS Head / Authorized Personnel, in case any changes are introduced by any statutory authority or as and when it is found necessary to change on account of business needs or as per Risk Management Policy.

This policy is reviewed on 14/12/2022

13. Policy communication

A copy of this policy shall be made available to all the relevant staff/persons such as Compliance officer/department in-charge, authorized persons and shall be displayed on the website of the company under the link <https://www.trustline.in/downloads>.

14. Applicability:

This policy shall be applicable to all the client(s) registered with Trustline Securities Ltd.

15. Disclaimer Note:

Strictly Confidential - For Internal Communication / Dissemination purposes only. Unintended recipients of this document are prohibited from disseminating, distributing, copying or using its contents. They should immediately destroy or notify the sender at 0120-41663300 or email at compliance@trustline.in.

We shall not be liable for any loss / damage caused by the usage of its content.

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