## Policy for unauthentic News Circulation for GAINN FINTECH PRIVATE LIMITED

The purpose of this policy is to avoid the unauthenticated news circulation related to various scrips by employees without adequate caution.

It has been observed that market news circulated through blogs/chat forums / email by employees without adequate caution can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms.

Therefore all the employees of the organization should follow internal code of conduct and controls of the company. Employees/Temporary staff/ voluntary workers etc working in the office will not encourage or circulate rumors or unverified information obtained from the client, industry and trade or any other sources without verification.

We have strictly informed all our staff members / sub-brokers not to send any sms, email, mms or by any mode to spread any rumors / heard news to any one from price sensitive information / news should be forwarded to client only after consent of any of our director to client only after consent of any of our director or compliance officer.

Our director / Compliance officer shall confirm the news with BSE/NSE/SEBI/ Government website before giving any consent or any of staff member.

**Access Control**: There is no Access to chat forums/ Messenger sites to all the staff. Only senior officials including Directors, Compliance Officer and Manager have the access to the said. All the logs of such sites shall be treated as records and are maintained by the compliance officer.

Any information or market related news received by staff in official mail or their personal mail should be forwarded only after the same has been seen and approved by Rajesh Kumar, Compliance Officer.

If any employee fails to follow these regulations he /she will be liable for strict actions .