



Asiatic Stock & Securities Ltd.

(Member: National Stock Exchange of India Ltd)

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Stock Broker Policy for Prevention of Circulation of Unauthorized Information

1. Objective

To establish a framework that prevents the unauthorized circulation of sensitive or misleading information by employees, ensuring compliance with **SEBI regulations** and maintaining market integrity.

2. Scope

This policy applies to all employees, agents, and representatives of the stock brokerage firm.

3. Regulatory Compliance

- Adherence to **SEBI (Stock Brokers) Regulations, 1992**.
- Compliance with **SEBI (Prohibition of Insider Trading) Regulations, 2015**.
- Implementation of guidelines from **SEBI's Master Circular on Prevention of Unauthorized Trading**.

4. Prohibited Activities

Employees must not:

- Share **unverified** or **misleading** market-related information.
- Distribute **confidential** client or company data without authorization.
- Engage in **rumor-mongering** or speculative discussions that could impact stock prices.
- Use **social media** or other platforms to spread unauthorized financial insights.

5. Preventive Measures

- **Training & Awareness:** Regular sessions on compliance and ethical trading practices.
- **Monitoring & Surveillance:** Implementation of systems to track employee communications.
- **Restricted Access:** Limiting access to sensitive financial data to authorized personnel.
- **Whistleblower Mechanism:** Encouraging employees to report violations confidentially.

6. Disciplinary Actions

Violations of this policy may result in:

- **Warnings** or **suspensions**.
- **Termination** of employment.
- **Legal consequences** as per SEBI regulations.

7. Record-Keeping & Audits

- Maintain records of employee communications for **audit purposes**.
- Conduct **periodic reviews** to ensure compliance.

This policy ensures that stock brokers operate within **SEBI's regulatory framework**, preventing unauthorized information circulation and safeguarding investor interests.