

## **Policy on Prevention of Circulation of Unauthenticated News**

### **1. Purpose**

This policy establishes guidelines and controls to prevent the circulation of unauthenticated news or rumors by employees, contractors, and representatives of Mohd Rizwan Shah, SEBI Regd. No.: INH000015880, in compliance with SEBI Circular No. CIR/ISD/1/2011 dated March 23, 2011.

### **2. Scope**

This policy applies to all employees, temporary staff, volunteers, and third-party service providers of Mohd Rizwan Shah across all offices and communication channels including email, social media, chat forums, and messenger applications.

### **3. Definitions**

**Unauthenticated News:** Any market-related information or rumor not verified by an official source.

**Compliance Officer Details:** The designated officer (Mohd Rizwan Shah ) responsible for oversight of compliance matters.

**Chat Forums/Messenger Sites:** Public or private online platforms used for real-time messaging.

### **4. Policy Statements**

4.1 Internal Code of Conduct: The code of conduct is given in the annexure A of this document

4.2 Controlled Access: Restrict or supervise employee access to blogs, chat forums, and messenger sites. Unauthorized access is prohibited.

4.3 Logging: Maintain logs of access to and usage of blogs, chat forums, and messenger sites. Retain logs for a minimum of five years.

4.4 Verification Requirement: All market-related news received via any channel must be verified and approved by the Compliance Officer prior to circulation.

4.5 Approval Workflow: Employees must forward any received market information to the Compliance Officer. No forwarding or posting is allowed until written approval is obtained.

4.6 Employee Awareness: Ensure employees complete annual training on the risks of circulating unauthenticated news and this policy.

4.7 Disciplinary Action: Violations of this policy may result in disciplinary measures up to and including termination of employment.

## 5. Roles and Responsibilities

Role	Responsibilities
<b>Employees</b>	Comply with verification and approval procedures; report any unauthenticated news to Compliance Officer.
<b>Compliance Officer</b>	Review and verify all market-related information; maintain approval records and logs.
<b>IT Department</b>	Implement technical controls to restrict or monitor access to unauthorized sites; retain logs.
<b>HR Department</b>	Ensure policy acknowledgment and arrange annual training for all employees.

## 6. Procedures

6.1 Receipt of Information: Employees must immediately forward any market-related news to the Compliance Officer.

6.2 Verification: Compliance Officer confirms source authenticity using official announcements, company communications, or credible news agencies.

6.3 Approval: Upon verification, Compliance Officer issues written approval to the requesting employee.

6.4 Distribution: Approved information can then be circulated via appropriate internal or external channels.

6.5 Record-Keeping: Compliance Officer files all approval requests and decisions in a central repository.

## 7. Record Retention

Maintain all related records including logs, approval requests, and correspondence for a period of at least five (5) years or as required by applicable regulations.

## 8. Policy Review

This policy shall be reviewed annually, or sooner if required by regulatory changes, to ensure its effectiveness and compliance with SEBI guidelines.

## 9. References

SEBI Circular No. CIR/ISD/1/2011 dated March 23, 2011

SEBI Master Circular dated May 21, 2024 (Clause 9)

## Annexure A

### Code of Conduct for Verification of Market-Related Information

#### 1. Introduction

This Code of Conduct sets out the principles and procedures for verifying all market-related information before dissemination by Mohd Rizwan Shah, SEBI Regd. No.: INH000015880, in line with Clause 4.1 of the Policy on Prevention of Circulation of Unauthenticated News.

#### 2. Scope

This Code applies to all employees, contractors, consultants, and third-party service providers engaged in the creation, review, approval, or dissemination of market-related information.

#### 3. Core Principles

- 3.1 Accuracy: Ensure that information is complete, factual, and free from material error.
- 3.2 Objectivity: Present market data and opinions impartially, without bias or undue influence.
- 3.3 Transparency: Clearly disclose all sources, assumptions, and limitations of the information.
- 3.4 Accountability: Individuals responsible for information verification must be identifiable and answerable.

#### 4. Verification Procedures

- 4.1 Initial Assessment: Upon receipt or creation of market-related information, assess its origin and potential impact.
- 4.2 Source Validation: Confirm the authenticity of information with at least two independent, credible sources.
- 4.3 Documentation: Record verification steps, sources consulted, and outcomes in the Verification Log.
- 4.4 Compliance Officer Review: Submit the Verification Log and information to the Compliance Officer for approval.
- 4.5 Final Approval: Only after written approval from the Compliance Officer may information be disseminated.

#### 5. Roles and Responsibilities

Role	Responsibility
Information Creator	Initiate verification and maintain accuracy of content before submission.
Information Reviewer	Conduct secondary review of content for

	consistency and completeness.
Compliance Officer	Authorize dissemination and maintain the Verification Log.
IT Support	Maintain secure systems for log retention and access control.

## 6. Training and Awareness

All personnel covered by this Code shall complete training on verification procedures and this Code of Conduct upon joining and on an annual basis thereafter.

## 7. Compliance and Enforcement

Non-compliance with this Code may result in disciplinary action, up to and including termination of employment or contract, in accordance with Company policies and applicable laws.

## 8. Amendment

This Code may be reviewed and amended periodically by the Compliance Officer in consultation with senior management to reflect regulatory changes or operational needs.

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**For,**  
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