



**SBJ MULTICOM**

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**SHREE BALAJI MULTICOMMODITIES PVT.LTD.**

**Version 2.2023**

**(Reviewed on 27.03.2023)**

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**POLICY FOR UNAUTHENTICATED NEWS &  
POLICY ON INSIDER TRADING**

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**Circulated by SEBI Registered Market Intermediaries through various modes of communication Pursuant to SEBI Circular Cir/ISD/1/2011 dated March 23, 2011**

It has been observed by SEBI that unauthenticated news related to various scripts are circulated in blogs/chat forums/e-mail etc. by employees of Broking Houses/Other Intermediaries without adequate caution as mandated in the Code of Conduct for Stock Brokers and respective Regulations of various intermediaries registered with SEBI.

Damage can be caused by circulation of unauthenticated news or rumors. It is a well-established fact that market rumors can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms.

In view of the above, internal code of conduct and controls is specified as under

- Employees/temporary staff/voluntary workers etc. employed/working with **SHREE BALAJI MULTICOMMODITIES PVT. LTD.** will not encourage or circulate rumors or unverified information obtained from client, industry, any trade or any other sources without verification.
- All access to Blogs/Chat forums/Messenger sites etc. should will restricted and will be after the permission and under the supervision of the CMD
- 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 functioning of the Market Intermediaries
- Employees are 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 Compliance Officer. If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act/Rules/Regulations etc. and shall be liable for actions.
- We do not provide any kinds of tips and unauthenticated news circular to our clients, nor allowed any of our employees to circulated unauthenticated news.

- Many a times client asks to us about our opinion on market movement & Market forecast but we have instructed all our employees to refrain from giving any kind of stock specific market forecast.

### **Policy on Insider Trading**

We do not have any accounts where in any of the employees of listed companies who may have access to insider information and we have instructed very specifically that if any of our client is buying /selling in specific stock in larger quantities such information is kept confidential and not circulated. However, our entire client base is retail client and you observe our trading that they brought /sell the shares in smaller quantities.

There is no possibility of any of our clients to have an access to insider information of any listed companies.