

“Code of conduct cum policy in compliance with SEBI circular dated March 23 and March 24, 2011 regarding “Unauthenticated news circulated by SEBI Registered Market Intermediaries through various modes of communication”

1. Employees/temporary staff/voluntary workers etc. employed/working in the Offices of LKP/Sub brokers of LKP/DP operations or Authorized Persons/ Branches/Remisiers shall not circulate or encourage circulation of any rumors or unverified information, in whatever form, including the medium of any blog/ chat forum/messenger sites etc. obtained by him from any source, including any client, industry, trade etc, without verification of the news. However they can very well send the tips/advice provided to them by retail Advisory of LKP.
2. Employees are not supposed to disseminate their own assessment/advice/tips/news about market movement from LKP’s or any other email ID/blog / chat forum/messenger site etc. received by them in any manner as specified above, without the approval of compliance.

For example: suppose an employee having sufficient knowledge of chart , analyses a chart or gathers some information about a scrip/security and based on it he/she advises somebody else, the chart or information so collected should be maintained by the employee as record. In the same manner if an employee comes to know from any third party other than the retail advisory board of LKP any news item, tip or advice , the same should be first analyzed by the employee so as to ascertain its veracity then only it should be forwarded onwards. The basis of such analysis needs to be maintained for record purpose. The employees are required to maintain on record the chart/information/news so approved by compliance , which will be called for by compliance for verification purpose as and when deems fit by the department.

The period of maintaining record is min.5 years and in case a dispute has surfaced then the period will extend up till the time the dispute disposes of.

3. The respective analysts/officials who have been authorised by LKP to send tips to its clients /upload blogs on LKP’s website or maintain chat forum on behalf of LKP will do so after due verification of the data they are communicating and having sufficient proof to substantiate their views. 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 by these authorized persons for a period of min.5 years in either soft or hard form.
4. Employees may please note that in case the source of information is not verifiable , do not send any tips/news/advice. Any person found knowingly or unknowingly circulating unverified news/rumor and not maintaining proper record of compliance approval, will be held liable for strict action initiated against him/her.
5. Authorised persons also come under the purview of this policy and are requested to ensure compliance with the same.

6. Sub-brokers being SEBI regd. Intermediary are required to follow the guidelines mentioned in the aforesaid circular issued by SEBI.”