

## **Media Policy**

As we expand our business and grow organically as well as inorganically, the Organization is exposed to media and general investors and may get calls and queries from various media (print and electronic) regarding the developments within the Company or Group or seek views of the Company executives on various events and aspects such as capital market, economy, trade policy, capital market regulation, union budget, etc. Executives may also be invited for interviews, seminars, conferences, to present their views about the industry, sector, stocks or market in general. Therefore, it is pertinent to have media policy, so that, each one of us has fair idea, about our roles when contacted or approached by media or exposed to media.

“**Media**” includes print and electronic media, teleconference, seminars or any other private or public gathering where media persons are present or expected to be present or if it expected that views presented may get published.

Following office bearers shall have an authority to brief Media:

1. MD & CEO on all matters without any prior approval;
2. Broking Business Head and Distribution Business Head after intimating Compliance Officer and in the absence of Compliance Officer after intimating MD & CEO, on matters concerning their respective businesses only;
3. Research Head, with permission of Compliance Head/Officer and in the absence of Compliance Officer, MD & CEO regarding capital markets, national and international economic situations;
4. Fund Manager, after intimating and obtaining positive consent of Compliance Head/Officer about content of his proposed media brief.; or
5. Any other person/consultant official authorised by MD & CEO.

Delegation of powers:

1. MD & CEO may appoint/ authorize any employee of the Company to brief media about any specific event or development.
2. Research Head, in consultation with the Compliance Head/Officer or MD & CEO can authorize any senior analyst to brief media about sector covered by concerned analyst.

However, aforesaid delegation shall be specific and shall not be construed as general or standing or adhoc.

Responsibilities of Employees conducting Media brief:

1. to preserve and send to Compliance Department the gist of brief and published article on publication immediately
2. In case of planned or scheduled interviews, conference and seminars
  - a. Prior intimation to compliance department
  - b. The gist of interview/presentation post event by email to Compliance Head/Officer.

Communication with Authorities and Regulator:

In the event of an enquiry from an industry regulator or any other regulator/authority or department via mail, telephone or personal visit, employee must forward same to the Compliance Department. Compliance Department would direct the query to the concerned department. Request from regulators for information should be answered with complete, factual and accurate information. During inspection, examination or visit, Employees should not conceal or destroy any documents or misrepresent with any regulatory representative. In any case, only department heads or specifically authorised employees on case to case basis are authorised to provide data, document to the regulators.

#### General Restrictions:

1. Except above mentioned office bearers, no other employee shall speak to media. In case, any employee receives any call from electronic or print media, they should direct it to MD & CEO of the Company, who shall direct media to proper personnel.
2. Employees are not allowed to give public investment advice and shall not make stock/security specific recommendation. Security includes shares, debentures, stock or index futures and options etc. Interviewee can speak about general market, political and economic situations.
3. No brief should indicate any political party or listed company or group specific affiliation or favor.
4. Authorised Research employee/Research Head, Business Heads and Fund Manager shall while giving any specific advise should disclose that they or their dependent family members may have long and short term position in the advised stock and should also give disclaimer that views expressed are their individual views, Company and the Company's client may have same or opposite views and outstanding positions.
5. As per SEBI circular number Cir/ISD/1/2011, Employees shall be 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 action.

#### Advisory:

1. Make clear communication, avoid vague language
2. Be courteous, avoid being aggressive.
3. follow protocol
4. Your appearance should be pleasant and one should not face media in unkempt manner

Any breach of this policy may tantamount to breach of employment terms and condition and can lead to wage freeze, suspension termination, and monetary penalty including recovery of notional loss to organisation due to tarnishing of goodwill, reputation or loss of deal/mandate etc.