



POLICY ON DISSEMINATION OF MARKET RELATED INFORMATION

As per SEBI's circular, Cir/ ISD/1/2011 March 23, 2011, It has been observed by SEBI that unauthenticated news related to various scrips 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.

SEBI felt that due to lack of proper internal controls and poor training, employees of such intermediaries are sometimes not aware of the damage which can be caused by circulation of unauthenticated news or rumours. It is a well established fact that market rumours can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms.

To conform to the SEBI directives, it has been decided to install proper internal code of conduct and controls to prevent such lapses. Accordingly,

All access to Blogs/Chat forums/Messenger sites etc. have been restricted under supervision. If any such chats with Clients have to take place, they will be done with express permission of the Management, and logs of such communication will be saved and kept as evidence for inspection by the relevant authorities.

All Dealers / Departments have been instructed not to send any mails received on market related news to any clients until approved by the Compliance Officer. Copies of all such Mails received and sent are saved in the Sent Boxes of the email designated for to each department / employee.

Strictly follow the code of conduct policy of the company.

Not to communicate any Price Sensitive Information to any non-applicable person.

Not to use Price Sensitive Information to buy or sell securities of any sort, whether for their own account, their relative's account, Company's account or a client's account. (Relative to

include self, spouse, dependant children and their spouses, dependant parents, dependant grand parents, dependant brothers, sisters and their spouses)

Not pass on such information directly or indirectly by way of making a recommendation for the purchase or sale of securities.

Not to engage in any price manipulation of any share singly or jointly with any other employee, client, management or any other person.

If such directives are flouted and the employee is caught, suitable action will be taken against them.

For ELIXIR EQUITIES PVT. LTD.


DIRECTOR

