

**POLICY ON CODE OF CONDUCT AND
CONTROLS**

**PRARAMBH SECURITIES PRIVATE
LIMITED**

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PANT NAGAR, GHATKOPAR (E), MUMBAI -400077**

Web address: www.prarambhsec.com

Policy on Code of Conduct & Controls

Objectives

To protect investors from and to stop unauthenticated news circulation by the Employees / Staffs or other dealing person of Prarambh Securities Pvt. Ltd.

Important considerations when reading this Code:

- The guidelines should be applied both in letter and in spirit.
- This Code should be considered together with any applicable laws and regulations, as well as any Company policies and procedures.
- The Code applies to all of our employees, officers and directors, regardless of where you work or your position in the overall organization
- Anyone aware of any violation of this Code or of any Company policy or legal requirement must report this violation. We will not tolerate retaliation against you for such reporting.
- If you fail to comply with the provisions of this Code or with another Company policy or procedure, you may be disciplined and/or dismissed. Violations of the standards outlined in this Code also could result in criminal penalties, civil liabilities, or both.
- All employees, officers, directors and authorised persons will strive to preserve and protect the Company's assets and resources and to ensure their efficient use.

Regulation

As per the code of conduct for Stock Broker in SEBI (Stock Brokers and Sub-brokers) Regulations, 1992 and SEBI circular CIR/ISD/1/2011 dated March 23, 2011, all SEBI registered market intermediaries are required to have proper internal codes of conduct to obstruct the market news circulation through blogs/chat forums/email by employees without adequate caution may cause considerable damage to the normal functioning and behavior of the market and distort the mechanisms thereof.

Therefore, all the employees of Prarambh Securities Pvt. Ltd. should follow internal codes of conduct and controls. Employees/staff etc. working in the office will not encourage or circulate rumours or unverified information obtained from the client, industry and trade or any other sources without verification. These guidelines are also applicable to the authorised persons.

Implementation of code of Conduct

In this regard, Prarambh Securities Pvt. Ltd. implements the codes of conduct for the various modes of communication. Company Directors/ Officers / Employees/ Staff etc. are prohibited from: -

1. Circulating rumors or unverified information obtained from clients, industry, any trade or any other sources without verification.
2. Circulation of unauthenticated news related to various Scrips in blogs/chat forums/email etc.
3. Forwarding any market related news received in their official mail/personal mail/blog except after the same has been seen and approved by the Compliance Officer. All the reporting with regard to violation of the same shall be done to the designated Compliance Officer.
4. Circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.
5. Access to Blogs/chat forums/messenger sites etc. has been restricted by Prarambh Securities Pvt. Ltd. and is not allowed.

Access Control

There will be no access to chat forums/ Messenger sites to Employees/ staff except senior officials including Directors, Compliance Officer. All the logs of such sites shall be treated as records and are maintained by the IT dept. Any information or market related news received by staff in official mail or their personal mail should be forwarded after seen and approved by the Compliance officer.

Authorised Persons

Prarambh Securities Pvt. Ltd. would strive to conduct business in a manner reflecting the values, vision and objectives of the institution. Prarambh Securities Pvt. Ltd. will only do business with partners who are committed to a long-term relationship focusing on mutual growth and trust.

Entities shall be defined to be all such authorized persons, after duly filling the required (AP)" documents, who are looking to build a long-term relationship focusing on growing sales and/or support with respect to the existing and future prospective clients.

All APs must comply to and operate within the laws of the particular jurisdiction, including all such State legislatures, Taxation laws and laws applicable. If at any time, APs ceases to meet any statutory and/or other requirement, Prarambh Securities Pvt. Ltd. reserves the right to immediately cancel all its outstanding orders with that AP as well as terminate all of their agreements with the AP.

At the time of enrollment, and at the entire continuing time of the partnership, the Authorised person shall represent, warrant and declare that all such information provided in the (AP)” form is true and correct to the best knowledge. The Authorised person also represents, warrants and undertakes to have complied with all such statutory laws and compliances as it may be required to do so as per its jurisdiction and will continue to do so on a continuous basis.

Authorised persons shall be subject to reasonable audits from Prarambh Securities Pvt. Ltd. and its representatives from time to time.

Reporting Violations

Anyone aware of a violation of this Code or any Company policy or legal requirement must promptly report that violation. Where the Client has any grievances, he should promptly notify the same to our Compliance Officer in writing, mentioning sufficient details along with supporting documents to e-mail ID of the Compliance Officer compliance@prarambhsec.com and the grievances email ID ig@prarambhsec.com. The complaint shall be analyzed and redressed and replied to the client within 7 days/ sufficient time period from the date of the complaint with the resolution of the complaint.

Fair and honest dealing

Employees, officers and directors will deal fairly and honestly with Company stockholders, customers, suppliers, competitors and employees. The Company, its employees, officers, directors and authorised persons will behave in an ethical manner and will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

Compliance with laws, rules and regulations

The Company will strive to ensure that all activity by it or on its behalf is in compliance with applicable laws, rules and regulations. Employees, officers, directors and authorised persons are required to comply with all applicable laws, rules and regulations, whether or not specifically addressed in these policies.

Amendments

This Code may be amended only by the Board. Any waiver of the Code for any Company senior financial officer, executive officer or director may be made only by the Board or a duly authorized committee of the Board.

Integrity and a high standard of ethics are fundamental to our beliefs and must be upheld by all employees, officers, directors and Authorised persons. The Company is committed to doing what is right and deterring wrong doing. If you have concerns for the course of action, please consult your immediate supervisor, top executive or the compliance officer for direction: