

POLICY FOR INTERNET ACCESS & REGULATING CIRCULATION OF UNAUTHENTICATED NEWS OR RUMOURS BY EMPLOYEES

CORPORATE OFFICE :

Gopal Hub,1st Floor,
Dharamnandan Society,
Dabholi Road, Katargam,
Surat-395004

It's a Master Policy of the Company for the acceptance of Prefunded Instruments. This policy is Subject to the rules and regulations of the Exchange from time to time.

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| Title | PARIM FINSERV Policy for Internet Access & Regulating circulation of unauthenticated news or rumours by employees, 2011 |
| Coverage | Head office, all the branches of the Company and all the franchisees of the company are cover. |
| Preamble | SEBI vide its circular no. Cir/ISD/1/2011 dated March 23, 2011 and circular no. Cir/ISD/2/2011 dated March 24, 2011 directed all SEBI registered market intermediaries to put in place a proper internal code of conduct and control so as to ensure that unauthenticated news related to various scrips are not circulated in blogs/chat, forums/e-mails etc. by the employees, temporary staff, voluntary workers etc. of market intermediaries. Though, at present only restricted access of websites through internet is made available to the employees of the company, a need was felt to properly document the internet access policy and other areas of these circulars. In light of the above, PARIM FINSERV has prepared the following policy with respect to access of internet and regulation of circulation of unauthenticated news or rumours by employees of the Company. |

The Policy Will Be Known And Referred To As "Policy For Internet Access And Regulating Circulation Of Unauthenticated News Or Rumours By Employees, 2011". The Same Shall Be Effective From June 13, 2011.

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| Definitions | <p>"Unrestricted websites" are those websites, access of which will be available to all the employees of the company without any restriction.</p> <p>"Blocked websites" are those websites, access of which will not be available to any of the employees of the company.</p> <p>"Restricted websites" are those websites, access of which will be available only to select set of employees of the company.</p> |
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| Objectives And Principles Of This Policy | 1. To ensure that no employee of the company directly or indirectly encourages or circulates rumours or unverified information (unauthenticated news) obtained from clients, industry, any trade or any |
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other source in any manner.

2. To have proper internal code of conduct and control over access and use of internet by the employees of the Company.

Applicability

This policy is applicable to all employees of PARIM FINSERV (including temporary staff, voluntary workers etc.) working at all locations including employees of branches. All are required to follow the policy formulated by PARIM FINSERV both in letter and spirit.

Guidelines For Internet Access

“Unrestricted websites” are those websites access to which will be made available to all the employees of the company without any restrictions. Websites of Exchanges, SEBI, Depositories, ROC, RBI, Banks, Income Tax Department, various regulators etc normally falls under this category. List of such “Unrestricted websites” will be periodically reviewed by the Information Technology (IT) department and any addition/deletion in this list can be made by the IT department only with the approval of compliance officer and Director of the company.

“Blocked websites” are those websites, access to which will not be made available to any of the employees of the company. Blogs, Chat Forums, Messengers, Personal Emails, Social networking sites etc normally fall under this category. If any employee of the company wants access to these “Blocked websites” either on temporary or permanent basis then they need to provide justification and proper reasoning for the same and will also require prior approval of the respective HOD and CEO of the company. It will be the responsibility of the respective employee and HOD to maintain proper logs for any usage of such Blogs, Chat Forums, Messenger, Personal Email, social networking sites etc. as mentioned in the above SEBI circulars.

“Restricted websites” are those websites, access to which will be made available only to employees having designation of **Assistant Manager** and above. Various search engines such as Google, Yahoo etc fall under this category. If any employee of the company below the designation of

Assistant Manager wants access to these “Restricted websites” either on temporary or permanent basis then they need to provide justification and proper reasoning for the same and will also require prior approval of the respective HOD, Compliance Officer and Director of the company. Notwithstanding the above, access to restricted websites will be made available to all the employees in the research department irrespective of their designation.

One stand alone PC / Computer having internet and access to Restricted websites such as of personal emails like hotmail, gmail, yahoo etc. will be made available to the employees in case of an emergency.

However Temporary staff, Voluntary workers etc. will not be given access to any websites other than “Unrestricted websites” as mentioned above.

Responsibility of employees

1. All employees shall follow this policy in letter and spirit.
2. No employee shall directly or indirectly encourage or circulate rumours or unverified information obtained from any clients, industry, any trade or any other source in any manner.
3. No employee shall directly or indirectly forward any market related news received by them in their personal email / official email / blogs / chat / forums / social networking sites / SMS or in any other manner without verification by them and approval of the same by the Compliance Officer.

Undertaking

All existing employees as on the date of this policy are required to sign the undertaking in the format given in Annexure A and forward the same to the compliance officer by June 30, 2011. In case of new employees joining after the aforesaid date, duly signed undertaking should be given at time of joining PARIM FINSERV to the HR Department.

In addition to the undertaking as mentioned above, all the employees of front office desk such as dealers, relationship managers, sales and

marketing employees etc. are also required to submit the undertaking to the Compliance officer in the format given in Annexure B on yearly basis within a period of 10 days after the end of the financial year on March 31

**Employees
leaving
PARIM
FINSERV
Penalty for
contravention
of policy**

Any employee resigning from service or whose services are terminated or is leaving PARIM FINSERV for any reason whatsoever is required to give an undertaking to the HR Department in the format given in Annexure C.

Any employee contravening any of the provisions of this policy may be penalized and appropriate action may be taken against him/her by PARIM FINSERV which may include legal and disciplinary action such as salary freeze, suspension, recovery of the profits made on contravention of any of the clauses of this policy etc. The action taken by PARIM FINSERV shall not preclude SEBI/Exchange(s) from taking any action for violation of SEBI circulars and rules and regulations made in this behalf. In case it is observed by PARIM FINSERV/ Compliance officer that there has been serious violation of these regulations, SEBI/Exchange(s) shall be informed by PARIM FINSERV.

ANNEXURE "A"

Date: _____

To,
The Compliance Officer,
Parim Finserv
Surat

I hereby confirm that, I have read and fully understood the SEBI circular no. Cir/ISD/1/2011 dated March 23, 2011 and circular no. Cir/ISD/2/2011 dated March 24, 2011.

I hereby further confirm and undertake that -

- 1) I will follow the "Policy for Internet Access and regulating circulation of unauthenticated news or rumours by employees, 2011" framed by the Company and any amendments made thereof.
- 2) I will strictly follow the policy with respect to access to Blogs/Chat forums/Messenger sites/Social networking sites etc.
- 3) I will not directly or indirectly encourage or circulate rumors or unverified information obtained from clients, industry, any trade or any other source in any manner.
- 4) I will not directly or indirectly forward any market related news received by me in my personal email/official email/blog/chat/social networking sites/SMS or in any other manner without verification by me and approval of the same by the compliance officer.

I understand that market rumours can do considerable damage to the normal securities market behavior and functioning and distort the price discovery mechanism. I also understand that failure to comply with the requirement of above mentioned SEBI circulars will result in violation of various provisions contained in SEBI Act / Rules / Regulations etc. and I shall be liable for any action by the regulators as well as by Company.

I further undertake to reimburse the Company and Compliance Officer and Directors of the company for any action taken against them on account of non-compliance, if any, on my part, in connection with the aforesaid SEBI circulars and amendments thereof.

Signature: _____

Name of Employee & Employee Code: _____

Designation: _____

ANNEXURE "B"

Date: _____

To,
The Compliance Officer,
Parim Finserv
Surat

I hereby confirm that during the period _____ to March 31, _____, I have fully complied with the SEBI circular no. Cir/ISD/1/2011 dated March 23, 2011 and circular no. Cir/ISD/2/2011 dated March 24, 2011.

I hereby further confirm and declare that -

- 1) I have followed the "Policy for Internet Access and regulating circulation of unauthenticated news or rumours by employees, 2011" framed by the Company and amendments made thereof.
- 2) I have followed the policy with respect to access to Blogs/Chat forums/Messenger sites/Social networking sites etc.
- 3) I have not directly or indirectly encouraged or circulated rumours or unverified information obtained from clients, industry, any trade or any other source in any manner.
- 4) I have not directly or indirectly forwarded any market related news received by me in my personal email/official email/blog/chat/social networking sites/SMS or in any other manner without verification by me and approval of the same by the Compliance Officer.

I further declare that the information submitted as above is true and correct to the best of my knowledge and belief.

I understand that SEBI/Exchange(s)/PARIM FINSERV may take disciplinary action if any of the information submitted above is found to be false and incorrect.

Signature: _____

Name of Employee & Employee Code: _____

Designation: _____

ANNEXURE "C"

Date: _____

To
The Compliance Officer,
Parim Finserv
Surat

I hereby confirm that during the period _____ to _____ I have fully complied with the SEBI circular no. Cir/ISD/1/2011 dated March 23, 2011 and circular no. Cir/ISD/2/2011 dated March 24, 2011.

I hereby further confirm and declare that -

- 1) I have followed the "Policy for access of Internet and regulating circulation of unauthenticated news or rumours by employees, 2011" framed by the Company and amendments made thereof.
- 2) I have followed the policy with respect to access to Blogs/Chat forums/Messenger sites/Social networking sites etc.
- 3) I have not directly or indirectly encouraged or circulated rumours or unverified information obtained from clients, industry, any trade or any other source in any manner.
- 4) I have not directly or indirectly forwarded any market related news received by me in my personal email/official email/blog/chat/social networking sites/SMS or in any other manner without verification by me and approval of the same by the Compliance Officer.

I further declare that the information submitted as above is true and correct to the best of my knowledge and belief.

I understand that SEBI/Exchange(s)/PARIM FINSERV may take disciplinary action if any of the information submitted above is found to be false and incorrect.

Signature: _____

Name of Employee & Employee Code: _____

Designation: _____