



STEWART & MACKERTICH WEALTH MANAGEMENT LTD.

CIN: U51109WB1993PLC060987

Vaibhav (5F), 4, Lee Road, Kolkata – 700 020

Tel: (91 33) 3051 5400 / 4011 5400 Fax: (91 33) 2289 3401

Email ID: investors@smifs.com Website: www.smifs.com

POLICY FOR UNAUTHENTIC NEWS CIRCULATION

Policy Authored By:

Sudipto Datta

Shri Sudipto Datta
Compliance Officer

Pankaj Tiwari

Shri Pankaj Tiwari
Chief Financial Officer

Nisha Patodia

Miss Nisha Patodia
Company Secretary

Policy Reviewed on April, 2015



Page - 1



STEWART & MACKERTICH WEALTH MANAGEMENT LTD.

CIN: U51109WB1993PLC060987

Vaibhav (5F), 4, Lee Road, Kolkata – 700 020

Tel: (91 33) 3051 5400 / 4011 5400 Fax: (91 33) 2289 3401

Email ID:investors@smifs.com Website: www.smifs.com

1. Objective:

In order to prevent stock manipulation through unverified news and rumours and to establish proper internal controls to ensure that proper checks and balances are in place to govern the conduct of the employees to prevent speculative news and rumours, this "**Unauthenticated News Circulation Policy**" is being formulated under the instructions of the Board Members of the Company, in compliance and/or as mandated by Securities and Exchange Board of India, The Stock Exchanges and Depository where the Company is a Portfolio Manager, Trading Member and Depository Participant.

2. Responsibility:

2.1 The Compliance Officer shall be responsible for the implementation and supervision of this Policy.

2.2 The Associate Compliance Officer, Risk Management Officer and IT Manager shall assist and report to the Compliance Officer, if any non-compliance of this policy are observed.

2.3 The Compliance Officer shall take all necessary steps to monitor, document, analyze and report the findings to the Board Members as well as the relevant Stock Exchanges and/or regulatory bodies, in a time bound manner, as detailed hereunder and/or as mandated by the Stock Exchanges and/or regulatory bodies.

2.4 The Compliance Officer shall exercise his/her independent judgment and take adequate precautions to ensure implementation of an effective monitoring mechanism, based on the day-to-day activities of the clients, general market information and the facts and circumstances.

2.5 The Internal Auditor of the Company, shall review the implementation, documentation, effectiveness and review the actions taken during the period of audit and shall record the observations with respect to the same in their Internal Audit Reports.

Policy Reviewed on April, 2015



Page - 2



STEWART & MACKERTICH WEALTH MANAGEMENT LTD.

CIN: U51109WB1993PLC060987

Vaibhav (5F), 4, Lee Road, Kolkata – 700 020

Tel: (91 33) 3051 5400 / 4011 5400 Fax: (91 33) 2289 3401

Email ID:investors@smifs.com Website: www.smifs.com

2.6 The Board of Directors shall peruse, review and provide necessary guidance with regard to the “**Unauthenticated News Circulation Policy**”, periodically, for strengthening the processes.

3. Concepts:

3.1 Unauthenticated News: Unauthenticated News means information which are not established or confirmed from reliable sources. The claims made by or about the subject may or may not be true.

3.2 Blogs: Blogs are a type of website or part of a website wherein regular entries of commentary, descriptions of events, or other material such as graphics or video etc. are maintained and discussed in an interactive way.

3.3 Chat Forums: Chat forums or message board, is an online discussion site where people can hold conversations in the form of posted messages.

3.4 Communication Channels: Communication Channels means a channel, whether electronic or otherwise, used to convey any market related information. For example telephone/mobile phones, SMS, MMS, Blogs, Chat Forums, Messenger sites, Social Networking Sites and such other channels as may from time to time be used.

4. Code of Conduct

4.1 Employees / Temporary Staff / Voluntary Workers etc. employed / working with Stewart & Mackertich shall NOT circulate rumors or any unverified information obtained from any source such as client, industry, any trade or any other sources without verification. Any violation of the same by any Employees / Temporary Staff / Voluntary Workers etc., shall be subject to strict disciplinary actions.

4.2 Employees / Temporary Staff / Voluntary Workers etc. shall NOT use Blogs / Chat/ Forums/Messenger sites.

4.3 The IT Manger shall block all Blogs / Chat / Forums / Messenger sites for individual users.





STEWART & MACKERTICH WEALTH MANAGEMENT LTD.

CIN: U51109WB1993PLC060987

Vaibhav (5F), 4, Lee Road, Kolkata – 700 020

Tel: (91 33) 3051 5400 / 4011 5400 Fax: (91 33) 2289 3401

Email ID:investors@smifs.com Website: www.smifs.com

4.4 Use of Blogs/Chat/Forums/Messenger sites shall be done with the permission of Compliance Officer.

4.5 Logs for any usage of use of any Blogs/Chat/Forums/Messenger site shall be maintained by the IT – Systems Department and shall be reviewed by the IT Manager / Compliance Officer on a Concurrent basis. Misuse / Non-Compliance shall be reported to the Compliance Officer promptly for necessary action.

4.6 Employees shall communicate to the Compliance officer any market related news received by them either in their official mail / personal mail / blog or in any other manner, for necessary approval for providing the same to the Clients.

5. Disciplinary Action(s):

5.1 The employees shall provide necessary declarations/undertaking to ensure compliance of the SEBI Circular dated 24/03/2011 on "Unauthenticated News Circulated by SEBI Registered Market Intermediaries through various modes of Communication".

5.2 The Compliance Officer shall be held liable for breach of duty in this regard for any non compliances.

5.3 The Compliance Officer shall recommend for Disciplinary Actions to the Board of Directors in respect of the employees who violates the Code of Conduct of this Policy.

5.4 The employees found guilty of violating the Code of Conduct of this Policy shall be deemed to have violated the various provisions contained in SEBI Act / Rules / Regulations etc. and may face Disciplinary Actions, including legal actions, as decided by the Board of Directors.

6. Management Information System (MIS):

6.1 A daily MIS Report (by T+1 day) shall be generated by the IT Manager with regard to its finding on the use of Blog/Chat Sites or any observations made by him/her, to the Compliance Officer.





STEWART & MACKERTICH WEALTH MANAGEMENT LTD.

CIN: U51109WB1993PLC060987

Vaibhav (5F), 4, Lee Road, Kolkata – 700 020

Tel: (91 33) 3051 5400 / 4011 5400 Fax: (91 33) 2289 3401

Email ID:investors@smifs.com Website: www.smifs.com

6.2 A monthly MIS report (by 7 Calendar Days from the end of each month) shall be submitted by the Compliance Officer to the Designated Director. The Compliance Officer shall apprise the Board of Directors of the exception(s) noticed, if any as also the Actions taken by him/her.

6.3 A Quarterly MIS report (by 30 Calendar Days from the end of each quarter) shall be submitted by the Compliance Officer to the Board of Directors. The Compliance Officer shall apprise the Board of Directors of any exception(s) noticed, if any as also the Actions taken by him/her.

6.4 Internal Auditor shall verify and submit separate report on a monthly basis (by 15 Calendar Days from the end of each month) in respect of Pre-Funded Instruments and Electronic Fund Transfers and the actions taken in respect of the Compliances made and pending actions, if any.

7. Record Maintenance:

7.1 The Compliance Officer shall be responsible for the record maintenance of such activities.

7.2 The Compliance Officer shall be assisted by the Associate Compliance Officer and shall have the discretion to take assistance/help from any professionals and/or software for the better Monitoring of the Policy, with prior approval of the Board of Directors, without diluting the accountability and responsibility of the Compliance Officer.

