## M PRASAD & CO LTD 7, LYONS RANGE 3<sup>RD</sup> FLOOR KOLKATA - 700001

To protect investors from and to stop unauthenticated news circulation by the Company's Employees / Temporary Staff or other dealing person and by company Infrastructure.

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 govern the conduct of its Employees. It has been observed that market news circulated through blogs/chat forums / email by employees without adequate caution can cause considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms.

Therefore all the employees of the organization should follow internal codes of conduct and controls of the company. Employees/Temporary staff/ voluntary workers 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.

In view of same, **M Prasad & Co Limited** implements codes of conduct for the various modes of communication. Company Directors/ Officers / Employees/ Temporary Staff /Voluntary Workers are prohibited from:-

- 1. Circulation of unauthenticated news related to various Scripts in blogs/chat forums/e-mail etc.
- 2. Encouraging or circulating rumors or unverified information obtained from clients, industry, any trade or any other sources without verification.
- 3. Either forwarding any market related news received in their official mail/personal mail/blog Or in any other manner except after the same has been seen and approved by the Compliance Officer.
- 4. The circulation of rumors or unverified information obtained from client, industry, any trade Or other sources without verification.
- 5. Forwarding any market related news received by them either in their official mail/personal Mail/blog or in any other manner and all the reporting with regard to violation of the same shall be done to the designated Compliance Officer.
- 6. Access to Blogs/chat forums/messenger sites etc. has been restricted by M Prasad & Co Limited and is not allowed.

NOTE :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 disciplinary action.

**Access Control :** There is no Access to chat forums/ Messenger sites to all the staff. Only senior officials including Directors, Compliance Officer and Manager have the access to the said. All the logs of such sites shall be treated as records and are maintained by the compliance officer. This code can be modified/amended/altered as required from time to time in compliance of the relevant provisions/regulations in this regard .Any information or market related news received by staff in official mail or their personal mail should be forwarded only after the same has been seen and approved by **Mr. Rajendra Prasad Bubna, Director.** If any employee fails to follow these regulations he /she will be liable for strict actions.

Where the Client has any grievances, he should promptly notify the same to our Compliance Officer in writing, containing sufficient details along with supporting documents. The email Id of the Compliance Officer is bimalsuru@hotmail.com and the grievances email id is <u>mprasadcoltd@gmail.com</u>. The grievances received by the Investor relations officer will be immediately analyzed and redressed. The matter will be informed to the concerned department, who will solve the matter and the reply will be sent to the client within 7 days from the date of the complaint with the resolution of the matter.

- 1. The Investor Grievance redressal process is as follows:
- 2. The company has a designated investor grievances email id which is <u>mprasadcoltd@gmail.com</u> where the client or investor can make a complaint.
- 3. An Investor / client can make a written complaint through letter also.
- 4. The Company maintains and 'investor grievance register' in which full details of every Written complaint shall be entered.
- 5. Designated person shall login to the designated investor grievances email id on a daily basis to look after the investor complaint to check whether new complaints have been lodged in or not.
- 6. The full details of the written complaint must be passed to the concerned department and be forwarded to the compliance officer of the company as soon as it is received.
- 7. A letter or mail must be written to all the investor s who have submitted written complaints, by the Compliance Officer an acknowledging receipt of the complaint which should also inform them the complaint will be dealt with.
- 8. The Compliance Department will obtain all information available on the complaint which is considered necessary for a proper investigation , look into all the necessary information and resolve it as soon as possible.
- 9. There is standing policy of the company to resolve the investor complaint within seven days of the receipt of the same expect the complicated case.

- 10. A serious complaint (where the written response does not settle the issue) must be referred to the director of the company.
- 11. The Compliance Officer of the Company shall review the investor complaint register on weekly basis to find out whether complaint has been resolved within time or not.

Details of complaints received and replies sent are recorded and kept in our system for future references and verification by officials. If the matter cannot be handled, the client will be informed about the same with reasons for the non resolution along with appropriate suggestions to resolve the case and to approach alternative mechanism for redressal if any.

In case not satisfied with the response, investors can send in their complaints to the SEBI Regional Office at:

L&T Chambers, 3rd Floor 16 Camac Street Kolkata 700 017 Tel: 033 2302 3000 Fax: 033 2287 4307 Email: sebiero@sebi.gov.in