

VT CAPITAL MARKET PRIVATE LIMITED

Registered Office: 27AB Royd Street, Ground Floor, Kolkata-700016
Member-NSE-14759, BSE-4020 & MCX-35970 SEBI Reg no: INZ000168637

Internal code of conduct and controls- Unauthenticated news

This has reference to the Notices from BSE, NSE and MCX forwarding therewith the SEBI Circular dated 23rd March 2011 and Addendum dated 24th March 2011 on the subject of Unauthenticated news circulated by Market Intermediaries (SEBI Registered) through modes of communication (copies attached).

The abovementioned two Notices from SEBI are also available on SEBI website at www.sebi.gov.in under the category 'Legal Frame work'

These SEBI Notices are self explanatory and all concerned have to ensure that there is complete compliance with what is stated in these Notices.

In view of these notices all employees including temporary staff / voluntary workers / Sub-brokers / Arbitrageurs / Any One Associated with such intermediaries working from the office premises of the Company are advised to follow the instructions given below with immediate effect.

- [1] All concerned are advised not to encourage or circulate rumors or unverified information obtained from client, industry, any trade or any other sources unless it is verified and confirmed by our Company's Compliance Officer Mr Rohit Agarwal. (Mr Rohit Agarwal before giving OK will obtain approval of the Management)
- [2] Please note that access to Blogs / Chat forums / Messenger sites etc will be done /permitted after obtaining specific permission from the Management.
- [3] To ensure that Logs for any usage of such Blogs / Chat forums / Messenger sites shall be verified by the respective Regulations which govern by the concerned intermediary. Mr Rohit Agarwal Compliance Officer will be keeping records of all those blogs for verification, if found any rumors or any unauthenticated news, informs to the director Mr Vaibhav Anil Jain.
- [4] All concerned are advised that any market related news received by them either in their official mail / personal mail / blog or in any other manner, should be forwarded only after the same has been seen and approved by our Compliance Officer (Mr Rohit Agarwal). If any employee / other concerned person fail 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 suitable action.
- [5] Mr Rohit Agarwal the Compliance Officer shall also be held liable for breach of duty in this regard for any lapse on his part.
- [6] In case any clarification / information is required you have to contact the Director- Mr Vaibhav Anil Jain at 9819294540.



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Important Circular - for information and necessary action.

Date: 11th June, 2012

To,

All Employees / Branch Offices / Authorized Persons and other concerned persons

Sub: Unauthenticated news circulated by SEBI Registered Market Intermediaries through modes of communication - SEBI Circular dated 23rd March 2011 and Addendum dated 24th March 2011

We have received Notices from BSE and NSE forwarding the abovementioned two Notices from SEBI, copies of which are attached herewith. It is also available on SEBI website at www.sebi.gov.in under the category 'Legal Frame work'.

These SEBI Notices are self explanatory and all concerned have to ensure that there is complete compliance with what is stated in these Notices.

In case you have any doubt or matter is not clear please contact Mr Rohit Agarwal Compliance Officer – 9831003552/033-40017926

Please confirm on copy of this circular and our Internal Code of Conduct & Controls for Unauthenticated News Circulation that you have understood the contents and will ensure to comply with the same.

In case you require any further information / clarification please let us know.

