

Policy on Circulation of Unauthenticated News

Prohibition on circulation of unauthenticated News:

To Protect Investors to Stop Unauthenticated News Circulation by the Company's Employees/ Temporary Staff or other dealing person and by company Infrastructure.

As per 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 code of conduct to govern the conduct of its Employees. In view of same, **Total Securities Ltd.** implements code of conduct for communicating through various modes of communication. Company's Employees/ Temporary Staff are prohibited from:

1. Circulation of unauthenticated news related to various Scrips in blogs/chat forums/e-mail etc.
2. Encouraging or circulating rumors or unverified information obtained from client, 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.

Our employees are restricted from circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.

The employees will have to seek prior approval from the designated Compliance Officer of **Total Securities Ltd.** - **Mr. Kamlesh Shah**, e-mail: kamlesh.total@gmail.com before 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.

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 to Blogs/chat forums/messenger sites etc. has been restricted by **Total Securities Ltd.** and access is not allowed.

BY Management Order

Mr. Kamlesh Shah
Director

Client code Modification Policy

We have very strict procedures for client code modification. In view of recent guidelines by exchange and SEBI we have practically stopped client code modification. In any unavoidable situation whereby client codes need to be modified it is only with the approval of directors. We do not have retail client work. In addition we have made a system in place whereby client code entry is verified and do not require to be changed frequently as normally one machine is used for one client.

Error code Modification Policy

The basic thrust of the company is to avoid error in punching client code at the order entry level

To achieve this company has strong process of verification of client code before data entry. As result the client code modification reported during the year is almost negligible. However, as a matter of perception company has developed client code modification policy keeping in view guidelines issued by exchange as well as regulators. The error in client code is reported to compliance officer after due verification modification if any, is authorized in compliance with the window offered by the exchange and the same is reported to the exchange. The focus of the policy remains on avoidance of error at entry level itself rather than correcting the same at later stage. Overall the policy has worked very well and has reduce no. of error to almost zero level in comparison with overall volume of the company and constantly remained at the lowest level of norms prescribed by the exchange.