

POLICY ON UNAUTHORISED NEWS CIRCULATION
TRDEZ INVESTMENT PRIVATE LIMITED
Version- 1.0

Author:	MS. VANSHIKA GHAG - (Governance Risk and Compliance Analyst)
Owner:	MR. CHETAN DHAR– (Compliance Officer)
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Version History

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1.0	06/10/2023	Ms. Vanshika Ghag Governance Risk and Compliance Analyst	NA	Mr. Chetan Dhar Compliance Officer	POLICY ON UNAUTHORISED NEWS CIRCULATION	06/10/2023

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POLICY ON UNAUTHORISED NEWS CIRCULATION

Policy in terms of Circular Nos. Cir/ISD/1/2011 dated March 23, 2011 regarding Unauthenticated news circulated by SEBI Registered Market Intermediaries through various mode of communication issued by Securities and Exchange Board of India (“SEBI”)

1. Applicability :

1.1 The policy framed hereunder and any amendments made thereto from time to time shall be applicable to persons associated with the entities of Trdez (hereinafter referred to as “TRDEZ”) which are **registered intermediaries with SEBI** in the following capacities:

- Director;
- Employee;
- Temporary staff;
- Trainees;
- Authorised Persons of TRDEZ;
- Such other person as may be specified from time to time; Hereinafter collectively referred as “person”.

1.2 The Policy shall become effective from October 3, 2023.

2. Appointment Of Designated Person :

- Each RE head shall appoint one of its employees as Designated Person for the RE. The Designated Person shall be appointed by RE on or before October 31, 2023.
- Designated Persons shall be responsible for proper monitoring and addressing any issues relating to this Policy.
- If any change is to be done in Designated Person due to his role change or vacation of services of the Company or otherwise, the same may be done by the Compliance Officer in accordance with Clause

2.1. HR Department shall be responsible for intimation of resignation/vacation of services of Designated Person. However, it should be ensured by the Compliance Officer that the Designated Person's position should not be vacant at any point of time.

- The Compliance Officer shall inform the name and other required details to respective Compliance Departments and HR Department within one day from the date of appointment of Designated Person or any change therein.

3. Circulation Of Information :

- Designated person shall ensure that no unauthenticated news shall be forwarded by any person of RE in any manner internally as well as outside TRDEZ.
- If any person wishes to forward any market related news received by him/her on personal mail or official mail to anyone internal or external recipients, the same shall first be forwarded to the Designated Person of the concerned RE who in turn shall obtain approval from respective Compliance Department before the same is forwarded anywhere else in any manner.
- In case, Designated Person discovers that any such communication has been forwarded without Compliance approval, he should immediately inform the same to respective Compliance Department for appropriate action (whether regulatory or otherwise) against the person.
- No person shall encourage or circulate rumors or unverified information obtained from any source.
- Any information which is to be circulated in any manner shall mention the authenticated source for various contents/data/report, etc. provided therein. Such sources of data shall be the part of the record to be retained.

4. Access To E-Mails/Blogs/Chat Forums/Messenger Sites, Etc :

- No access shall be allowed to any person with respect to personal e-mails, chat forums, blogs, messenger sites (called by any nomenclature) in office network without explicit approval from the respective RE's Designated Person who shall ensure that the same is not misused.
- Any approval mentioned in clause 4.1 shall be provided after obtaining an undertaking as per the format mentioned in Annexure 1.

- All such approval shall be reviewed from time to time by the Designated Person and in case Designated Persons feels that any person to whom the approval was given as mentioned in clause 4.1 is no longer required, the same shall be revoked.
- No person shall create their own Blog/Chat Forum/Messenger, etc. without prior approval of the Designated Person and Compliance Department.

5. Bulk Emails :

- Bulk mailing shall only be allowed from the e-mail IDs of Compliance Officers or of such other person as may be authorised by the Designated Person.
- Any approval mentioned in clause 5.1 shall be provided after obtaining an undertaking as per the format mentioned in Annexure 2.
- All such approval shall be reviewed from time to time by the Designated Person and in case Designated Persons feels that any person to whom the approval was given as mentioned in clause 5.1 is no longer required, the same shall be revoked.
- Bulk mailing means any communication to more than 10 numbers of e-mail IDs (other than internal people) at a time.

6. Monitoring And Maintenance Of Log :

- TRDEZ has right to monitor telephone, email, chat forum, messenger sites and internet traffic data (i.e. sender, receiver, subject; any attachments to email, numbers called and duration of calls; domain names of websites visited, duration of visits, and files downloaded from the internet) (called by any nomenclature) at a network level.
- For the removal of doubt, it is mentioned that there is a possibility of disclosure of sensitive personal information while monitoring telephone, email and internet traffic data (i.e. sender, receiver, subject; any attachments to email, numbers called and duration of calls; domain names of websites visited, duration of visits, and files downloaded from the internet) at a network level.
- Logs for any usage of any telephone, email, chat forum, messenger sites and internet traffic data (called by any nomenclature) shall be maintained as per the regulatory requirement of retention and maintenance of record.

7. Certification :

- Designated Person shall certify on quarterly basis that the RE has complied with this Policy within 15 days from the end of the quarter. Such certificate may be used by the Compliance Department to produce before the regulatory authorities, if required.

8. Declaration By Person :

- The person shall provide a declaration in the format prescribed in Annexure 3.
- Such declaration shall be provided by the Person at the following juncture: -
- For existing persons, within 15 days from the date of implementation of the policy;
- In case of new employee, at the time of joining.

9. Consequences Of Violation Of The Policy :

- Any violation of the above code of conduct by any person to whom this code applies can lead to severe punitive action against the erring person.
- Disciplinary action may be taken by TRDEZ in addition to the action that may be taken by SEBI or any other regulatory authority.

Annexure 1 – Format Of Undertaking As Per Clause 4.2

To,
Designated Person
Department

I, **Name and RE of the Person** hereby confirm that the access rights provided to me with regard to personal e-mails, chat forums, blogs, messenger sites (called by any nomenclature) in office network as an exception shall not be used in contradiction in terms of Circular Nos. Cir/ISD/1/2011 dated March 23, 2011 regarding unauthenticated news circulated by SEBI Registered Market Intermediaries through various mode of communication issued by Securities and Exchange Board of India (“SEBI”)

I confirm that I have read and understood the Policy of TRDEZ in terms of Circular Nos. Cir/ISD/1/2011 dated March 23, 2011 regarding unauthenticated news circulated by SEBI Registered Market Intermediaries through various mode of communication issued by SEBI.

I also understand that TRDEZ may monitor any information in terms of Clause 6 of the above-mentioned Policy and also understand that the same may contain any information which is personal in nature.

I further understand that in case of any violation of the above-mentioned Policy, an appropriate action (regulatory or otherwise) maybe initiated against me.

I agree to surrender the facility if the same is not required.

Thanking you,

Name and signature of the person
Date

Approved By (Designated Person)
Date

Annexure 2 – Format Of Undertaking As Per Clause 5.2

To,
Designated Person
Branch/Department

I (**Name of the Person**), hereby confirm that the bulk mailing facility provided to me as an exception shall not be used by me in violation of Policy in terms of Circular Nos. Cir/ISD/1/2011 dated March 23, 2011 regarding unauthenticated news circulated by SEBI Registered Market Intermediaries through various mode of communication issued by Securities and Exchange Board of India.

Further, I hereby agree that I shall: -

- Not facilitate other person to use the bulk mailing facility.
- Not to use the bulk mailing facility for personal purpose.

I am aware that all bulk mailing related activities are being monitored for tracking purpose and I agree to surrender the facility if the same is not required.

Thanking you,

Name and signature of the person

Date

Approved By (Designated Person)

Date

Annexure 3 – Format Of Declaration As Per Clause 8.2

To,

The Compliance Department TRDEZ Finance Group

Dear Sir,

This is to certify that Policy in terms of Circular Nos. Cir/ISD/1/2011 dated March 23, 2011 regarding Unauthenticated news circulated by SEBI Registered Market Intermediaries through various mode of communication issued by Securities and Exchange Board of India (“SEBI”) of TRDEZ Group has been read and understood by me in spirit and I am abiding by the same.

I also understand that TRDEZ may monitor any information in terms of Clause 6 of the above-mentioned Policy and also understand that the same may contain any information which is personal in nature.

I further understand that in case of any violation of the above-mentioned Policy, an appropriate action (regulatory or otherwise) maybe initiated against me.

Thanking you,

Name and signature of the person

Date

History Sheet

Sr.No.	Date	Remark
1.	October 3, 2023	The Version 1 is adopted, mail circulated to all, policy uploaded on intra-net