

BLOG CHAT POLICY

VARDHAMAN CAPITAL PVT LTD, herewith referred as VCPL, is the SEBI registered Stock Broker & Depository Participant. The under-mentioned blog chat policy is created by the Compliance Officer and approved by the Board of Directors on 23/03/2023.

OBJECTIVE

The purpose of this policy is to prevent circulation of unauthenticated news or rumors related to various scrips by the Company's Employees/Temporary Staff or other dealing person using company's Infrastructure without adequate caution, which can do considerable damage to the normal functioning and behavior of the market and distort the price discovery mechanisms.

OUT OF VARIOUS MEANS OF COMMUNICATION like SMS, E-mail, DSD (digital Signed Document), Website, Blogs/Chats etc. The company uses undermentioned Modes of communication for its day to day works:

- SMS
- E-mail
- DSD (digital Signed Document)
- Website

The **SMS** reporting is linked with data generated from back office software for sending details of trade, delivery, payments, margins etc to clients. No other form of SMS are allowed to send without the consent of compliance officer or senior managerial personnel's.

The company uses its own **EMAIL** IP address for sending email and DSD to inter department and clients. The same is linked with data generated from back office software for sending various reports of trade, delivery, payments, margins etc to clients. No other email ids should be created and used by any employee of the company for any official purpose.

The company website is administered by the **WEBSITE** creation company under the guideline of compliance officer or senior managerial personal. No other employee has been authorised by the company to look after this work.

POLICY FOR INTERNAL CODE OF CONDUCT:

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 the company implements code of conduct for communicating through various modes of communication. Company Directors/ Officers / Employees/ Temporary Staff Voluntary Workers are prohibited from: -

1. Encouraging or circulating rumours or unverified information obtained from client, industry, any trade or any other sources without any evidential verification.
2. Access to blogs/chat forums/messenger sites etc. are usually restricted by firewall. The company does not entertain any blogs/Chat forums/Messenger sites (called by any nomenclature).

3. Forwarding of any market related news, received in employee's official mail/personal mail/blog or in any other manner is debarred unless approved by the 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. Compliance officer is advised to administrate all the matters related to this as per NSE/ SEBI/PMLA rules and regulation and take appropriate measures as deemed fit in consultation with the management.

ACCESS RESTRICTIONS:

1. Access to social media platforms/ instant messaging services/ VoIP / Blogs/Chat forums/ websites/e-mail or any such medium shall be subject to controlled supervision and the same shall not be provided to any dealers other than the directors and compliance officer of the company.
2. Logs for any usage of social media platforms/ instant messaging services/ VoIP / Blogs/Chat forums/websites/e-mail or any such medium shall be maintained as specified by the respective regulations.
3. Any market related news received by the employees 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 the Compliance Officer. If an employee fails to do so, he/she shall be deemed to have violated the various provisions contained in SEBI Act and the Rules / Regulations framed thereunder, and shall be liable for action. Further, in such instances, actions shall also be initiated against the Compliance Officer.

APPROVAL AUTHORITY AND REVIEW POLICY:

This policy is approved by the Board of VARDHAMAN CAPITAL PVT LTD

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.

POLICY COMMUNICATION:

A copy of this policy shall be made available to all the relevant staff/persons such as: compliance officer / department in-charge / authorized persons.

Further, a copy of this policy has to be displayed on our website.