KSN CREDENCE COMMODITIES TRADING PRIVATE LIMITED

POLICY ON CIRCULATION OF MARKET-RELATED NEWS AND INTERNAL CONTROLS

1. Objective

The objective of this Policy is to establish appropriate internal controls and procedures to ensure that market-related news, information, rumours, recommendations or other market-sensitive information received or obtained by the employees, Directors, Authorised Persons and other associated persons of the Company is handled responsibly and is not circulated, forwarded or disseminated without appropriate verification and approval.

The Policy is intended to ensure compliance with the applicable provisions of SEBI regulations and directions and the circulars issued by the Stock Exchanges from time to time.

2. Scope and Applicability

This Policy shall be applicable to:

- Directors;
- Compliance Officer;
- Senior Management;
- Employees;
- Dealers and trading personnel;
- Authorised Persons and other associated persons, to the extent applicable; and
- Any other person acting on behalf of or associated with the Company.

3. Market-Related News

For the purpose of this Policy, market-related news includes, but is not limited to:

- News, rumours or information relating to securities, companies, commodities or markets;
- Information relating to price or volume movements;
- Corporate announcements or purported corporate announcements;
- Trading calls, recommendations or market views;
- Information received through email, WhatsApp, Telegram, social media, blogs, chat forums, websites or any other electronic or physical mode of communication; and
- Any other information which may have an impact on the market price, trading volume or investment decisions of clients or investors.

4. Prohibition on Circulation of Unauthenticated News

No employee, Director, Authorised Person or associated person of the Company shall circulate, forward, publish, transmit or otherwise disseminate any unauthenticated market-related news, rumour or information to clients, prospective clients, colleagues, social media groups or any other person.

Market-related information received through personal email, official email, WhatsApp, Telegram, social media, blogs, chat forums or any other source shall not be forwarded or circulated merely on the basis that it has been received from another person or source.

5. Verification and Approval Mechanism

Where any employee receives market-related news or information which is proposed to be circulated or communicated externally:

1. The employee shall not independently circulate or forward such information.
2. The information shall be submitted to the **Compliance Officer / designated Compliance personnel** for review.
3. The Compliance Officer shall assess, to the extent reasonably possible, the source, authenticity and nature of the information and determine whether the same may be communicated.
4. No such information shall be circulated externally unless it has been reviewed and approved by the Compliance Officer or a person specifically authorised by the Company for this purpose.
5. Wherever appropriate, the source of the information and supporting evidence shall be retained for record purposes.

6. Communication with Clients

Employees and other associated persons shall ensure that communications made to clients are accurate, fair and not misleading.

No employee shall:

- circulate unverified market rumours;
- make misleading or exaggerated statements regarding any security, commodity or market;
- provide unauthorised investment advice or recommendations;
- induce clients to trade;
- make assurances regarding returns or profits; or
- circulate information with the intention of influencing clients to undertake transactions.

All client communications shall be in accordance with the Company's applicable policies and regulatory requirements.

7. Social Media and Electronic Communication

Employees shall exercise due caution while using social media, messaging applications, blogs, chat forums and other electronic communication platforms.

Employees shall not use personal or official communication platforms for circulating unauthenticated market-related news or information on behalf of the Company.

No employee shall represent personal views, market rumours or unauthorised recommendations as being views or communications of the Company.

8. Internal Controls

The Company shall maintain appropriate internal controls to ensure compliance with this Policy, including:

- communication of this Policy to relevant employees and associated persons;
- appropriate awareness and sensitisation regarding the risks associated with circulation of unauthenticated market-related news;
- supervision by the Compliance Officer;
- maintenance of records of approvals wherever market-related information is formally approved for circulation;
- monitoring of relevant client and employee communications, wherever considered necessary and permitted under applicable law; and
- review and strengthening of controls whenever any regulatory change, incident or deficiency is identified.

9. Authorised Communication

Only employees/persons specifically authorised by the Company shall communicate with clients, media or the public on behalf of the Company regarding market-related matters.

Any public/media communication shall be made only after obtaining the requisite internal approval and shall contain only information that is accurate and appropriately verified.

10. Responsibility of Employees

Every employee and associated person is responsible for ensuring that information received by them is handled appropriately.

In case of any doubt regarding the authenticity, source or permissibility of circulation of any market-related information, the employee shall refer the matter to the Compliance Officer before taking any further action.

11. Reporting of Violations

Any suspected unauthorised circulation of market-related news, rumours, recommendations or other potentially misleading information shall be immediately reported to the Compliance Officer.

The Compliance Officer shall examine the matter and take appropriate corrective or preventive action in accordance with applicable laws, regulations and the Company's internal policies.

12. Disciplinary Action

Any violation of this Policy by an employee or associated person may be treated as a breach of the Company's Code of Conduct and may attract appropriate disciplinary action in accordance with the Company's applicable policies and regulatory requirements.

13. Training and Awareness

The Company shall take reasonable steps to sensitise employees and relevant associated persons regarding:

- the risks associated with circulation of unauthenticated market-related news;
- the requirement of prior review/approval;
- applicable regulatory requirements; and
- the consequences of non-compliance.

14. Review of Policy

This Policy shall be reviewed periodically and whenever there is any change in applicable laws, SEBI regulations, Stock Exchange circulars or internal requirements.