



## Policy on Code of Conduct & Controls relating to Unauthenticated News Circulation

### Objectives

To protect investors from and to stop unauthenticated news circulation by the Employees / Staffs or other dealing person of **Arya Fin-Trade Services (IFSC) Private Limited**. This Policy is established to ensure that **Arya Fin-Trade Services (IFSC) Private Limited** maintains the highest standards of integrity and professionalism in all external and internal communications, particularly concerning the dissemination of market-related information. It aims to **prevent the circulation of unauthenticated, misleading, or false news** that may influence market behavior, investor decisions, or regulatory compliance within the International Financial Services Centre (IFSC).

### Scope

This Policy applies to:

- All employees, representatives, agents, and affiliates of **Arya Fin-Trade Services (IFSC) Private Limited**.
- All communication channels: email, instant messaging, internal memos, social media, media interactions, research publications, investor communications, and any third-party correspondence.

### Definitions

**Unauthenticated News:** Any market-related, financial, or regulatory information not confirmed by an authorized source (e.g., official regulator, issuer, exchange filing, or certified news agency).

**Dissemination:** Any act of sharing, forwarding, publishing, or commenting on content, regardless of intent or accuracy, through formal or informal means.

### Regulation

As per the code of conduct for Stock Broker in IFSCA (Capital Market Intermediaries) Regulations, 2025 and NSE IFSC circular NSEIFSC/REG/1872 dated October 24, 2024, all IFSCA registered market intermediaries are required to have proper internal codes of conduct to obstruct the market news circulation through blogs/chat forums/email by employees without adequate caution may cause

considerable damage to the normal functioning and behavior of the market and distort the mechanisms thereof.

Therefore all the employees of **Arya Fin-Trade Services (IFSC) Private Limited** should follow internal codes of conduct and controls. Employees/staff etc. working in the office will not encourage or circulate rumours or unverified information obtained from the client, industry and trade or any other sources without verification.

## **Implementation of code of Conduct**

In this regard, **Arya Fin-Trade Services (IFSC) Private Limited** implements the codes of conduct for the various modes of communication. Company Directors/ Officers / Employees/ Staff etc. are prohibited from:-

1. Circulating rumors or unverified information obtained from clients, industry, any trade or any other sources without verification.
2. Circulation of unauthenticated news related to various Scripts in blogs/chat forums/e-mail, social networking sites etc.
3. Forwarding any market related news received in their official mail/personal mail/blog except after the same has been seen and approved by the Compliance Officer. All the reporting with regard to violation of the same shall be done to the designated Compliance Officer.
4. Circulation of rumors or unverified information obtained from client, industry, any trade or other sources without verification.
5. Access to Blogs/chat forums/messenger sites etc. has been restricted by **Arya Fin-Trade Services (IFSC) Private Limited** and is not allowed.

## **ACCESS CONTROL**

- Employees/temporary staff/voluntary workers etc. employed/working in the Company do not encourage or circulate rumours or unverified information obtained from client, industry, any trade or any other sources without verification. There will be no access to chat forums/ Messenger sites to Employees/ staff except to under supervision of senior officials including Directors, Compliance Officer. All the logs of such sites shall be treated as records and are maintained by the IT deptt. Any information or market related news received by staff in official mail or their personal mail should be forwarded after seen and approved by the Compliance officer.

If an employee violated the provisions contained in IFSCA Act/Rules/Regulations etc. and shall be liable for disciplinary action/ strict actions.

Where the Client has any grievances, he should promptly notify the same to the Compliance Officer in writing, mentioning sufficient details along with supporting documents to e-mail ID of the Compliance Officer and the grievances email ID. The complaint shall be analyzed and redressed and replied to the client within 7 days/ sufficient time period from the date of the complaint with the resolution of the complaint.

## **Policy Review**

This Policy will be reviewed annually or earlier if required due to regulatory changes or identified gaps in implementation.

## **Governance**

- The policy must be formally approved by the Board (or senior management), with the Compliance Officer responsible for ongoing oversight.
- Updates to the policy must reflect both amendments to IFSCA regulations (e.g. the new 2025 CMI rules) and any newly issued circulars if any.