Unauthenticated News Policy

Version 2.0

Policy Title	Unauthenticated News Policy — Internal Code of Conduct to Prevent Circulation of Unauthenticated News
Version	2.0
Date of Approval	16th Oct 2025
Effective Date	20th Oct 2025
Owner	Compliance Department
Approving Authority	Board of Directors of Pawan Parmeshwar Capital Pvt Ltd
Next Review Date	Annually, or earlier upon regulatory change
Replaces	Unauthenticated News Policy (legacy version, in force prior to this revision)

1. Introduction and Purpose

Pawan Parmeshwar Capital Pvt Ltd ("the Company") is a Stock Broker registered with the Securities and Exchange Board of India ("SEBI") and a Trading Member of the National Stock Exchange of India Ltd (NSE Code 00188) and BSE Limited (BSE Code 0550), and is a SEBI-registered market intermediary.

SEBI Circular Cir/ISD/1/2011 dated March 23, 2011 (consolidated in Para 2.3 of the SEBI Master Circular on Surveillance of Securities Market dated September 23, 2024) requires every SEBI-registered market intermediary to adopt and implement an internal code of conduct to prevent the circulation of unauthenticated news. Para 2.3.5 of the said Master Circular makes it clear that both the employee involved in such circulation and the Compliance Officer of the intermediary shall be liable for action where the framework is not implemented in accordance with the said circular.

This Policy constitutes the internal code of conduct so required and applies to the Company and all its employees.

2. Scope and Applicability

This policy applies to:

- All employees of the Company, including directors, senior management, Compliance Officer, dealers, research personnel, sales personnel, relationship managers, operations and support staff, and any contractors or persons working under arrangements equivalent to employment with the Company.
- All communication channels, including official Company email, Company-issued devices, telephone (recorded and unrecorded), instant-messaging applications (WhatsApp, Telegram, Signal, WeChat, Facebook Messenger, Instagram, LinkedIn messaging, SMS and any other), social-media platforms, chat forums, video calls, in-person communication, and any other mode by which information may be transmitted.
- All forms of market-related information, including views, opinions, analyses, rumours, news, tips, recommendations, forecasts and speculation about securities, issuers, market events, or market participants.

3. Definitions

- Which originates from a source that the recipient cannot verify or whose accuracy has not been independently verified by the recipient;
- Which has not been published or disseminated by an authorised source (such as an Exchange, SEBI, the issuer through a stock exchange disclosure, or a recognised news agency); and
- Which is forwarded, circulated or contributed to by the employee whether in his individual capacity, on behalf of the Company, or otherwise.

4. Regulatory Framework

- SEBI Circular Cir/ISD/1/2011 dated March 23, 2011 on "Circulation of unauthenticated news through various modes of communication by SEBI registered market intermediaries", as consolidated in Para 2.3 of the SEBI Master Circular on Surveillance of Securities Market dated September 23, 2024.

- SEBI (Stock Brokers) Regulations, 1992 (as amended), including the Code of Conduct in Schedule II.
- SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations, 2003.
- SEBI (Prohibition of Insider Trading) Regulations, 2015 (read with the Company's Insider Trading Code v2.0).
- Bye-laws, Rules, Regulations and Circulars of NSE and BSE.

5. Core Prohibition

No employee of the Company shall:

- Originate, forward, share, post, retransmit or otherwise circulate any Unauthenticated News, market rumour or unverified market-related information by any mode of communication.
- Encourage, induce or facilitate any other person (whether another employee, a client, a friend, a relative, or any third party) to originate, forward or circulate any Unauthenticated News.
- Use the Company's official email, devices, telephone lines, social-media identities, or any other Company-provided infrastructure for circulation of Unauthenticated News.
- Use his personal email, personal devices, personal mobile, personal social-media identities or any other personal infrastructure for circulation of Unauthenticated News in connection with the Company's business or in his capacity as a representative of the Company.

This prohibition applies regardless of whether the employee believes the information to be true, whether the employee has commented favourably or unfavourably on the information, and whether the information is forwarded in the original form or with edits or commentary.

6. Mandatory Verification before Forwarding

Before forwarding or circulating any market-related news, view, recommendation or analysis (whether to clients, internally, or otherwise), the employee shall ensure:

- That the information has originated from an Authorised Source.
- That the information has been verified to the extent possible by reference to such Authorised Source.
- That the forwarding has been approved by the Compliance Officer where such approval is required under Section 7 of this policy.

Where the information is the output of the Company's own research function, the employee shall further ensure that the research output has been formally cleared for dissemination by the relevant supervisor and the Compliance Officer in accordance with the research dissemination protocol of the Company, and that the dissemination is consistent with that protocol.

7. Compliance Officer Approval Requirement

The Compliance Officer's prior approval shall be obtained before:

- Any market-related news or commentary is forwarded by any employee to any client or to any external person, save for forwarding of unedited research output of the Company to clients of the research subscription service, which is governed by the research dissemination protocol.
- Any market-related communication is posted by the Company or by any employee on any social-media platform identifying himself as an employee of the Company or in connection with the Company's business.
- Any market-related news is published in the Company's name in any forum, publication, newsletter or press communication.
- Any employee, other than Authorised Personnel, accesses chat forums, messenger sites or other platforms in the course of the Company's business for the purpose of receiving or transmitting market-related information.

Approval of the Compliance Officer shall be recorded in writing (email being treated as writing) and shall be retained for the standard record retention period.

8. Restrictions on Access to Chat Forums and Messenger Sites

In accordance with the SEBI requirement, access to chat forums, messenger sites and similar platforms in the course of the Company's business is restricted to such Authorised Personnel as may be specifically designated in writing by the Board of Directors. The Board's authorisation shall identify the personnel and the platforms to which they have authorised access.

Authorised Personnel shall:

- Use such platforms only for the limited business purpose for which they are authorised.
- Not originate, forward or facilitate circulation of any Unauthenticated News on such platforms.
- Maintain logs of their activity on such platforms in a manner that permits review by the Compliance Officer.
- Comply with any additional conditions imposed by the Board in the authorisation.

Employees who are not Authorised Personnel shall not access chat forums, messenger sites or similar platforms in connection with the Company's business.

9. Logs and Records

To enable monitoring and post-facto review of compliance with this policy, the following logs and records shall be maintained:

- Email and message archives on the Company's email and IT systems, retained for the prescribed record-retention period.
- Logs of access to chat forums and messenger sites by Authorised Personnel.
- Records of Compliance Officer approvals issued for any forwarding of market-related news or commentary.
- Records of Board authorisations of Authorised Personnel and any conditions thereon.
- Records of complaints, alerts or incidents relating to circulation of Unauthenticated News, the examination conducted and the action taken.

Records shall be retained for not less than 8 (eight) years from the date of creation, in accordance with the Registers and Records Manual v1.0.

10. Cross-Reference to Other Policies

This policy is to be read together with:

- Mobile Phone Usage Policy v1.0 — which restricts use of personal mobile devices and prohibits use of WhatsApp / Telegram / similar messaging apps for client-order communication and for business-related market communication.
- Insider Trading Code v2.0 — which prohibits the communication or counselling on UPSI, and addresses information barriers.
- Conflicts of Interest Policy v2.1 — which addresses circulation of biased or self-interested market information.
- Order Acceptance Policy v2.0 — which prohibits receipt or transmission of client orders through non-permitted channels including WhatsApp, Telegram, personal mobile and social media.
- SORM Policy v2.0 — under which any alert arising from circulation of unauthenticated news shall be examined and closed.
- AML/PMLA Policy v2.0 — to the extent unauthenticated news activity may indicate market manipulation linked to money laundering.

- Risk Management and Surveillance Policy v2.0 — which addresses the broader surveillance and risk framework.

11. Sanctions for Non-Compliance

Para 2.3.5 of the SEBI Master Circular on Surveillance of Securities Market dated September 23, 2024 expressly makes both the employee involved in the circulation and the Compliance Officer of the intermediary liable for action.

In addition to such action as SEBI and the Exchanges may take, the Company shall in the event of breach of this policy by an employee:

- Conduct an internal enquiry under the supervision of the Compliance Officer.
- Issue an advisory, formal warning, suspension, withholding of variable compensation, demotion, or termination of employment, as appropriate to the seriousness of the breach.
- Withdraw the employee's access to chat forums, messenger sites and other platforms (where the employee is an Authorised Personnel) and review the Board's authorisation.
- Refer the matter to law enforcement authorities or other regulators where the conduct may amount to a violation of any other law.
- Record the breach and the action taken in the employee's personnel file.

No incentive compensation or bonus shall be paid or, having been paid, recovered, on grounds of breach of this policy. (Cross-reference: Conflicts of Interest Policy v2.1 — "no incentive recovery" framework.)

12. Training and Awareness

The Compliance Officer shall ensure that:

- All new joiners are trained on this policy as part of their induction and receive a written copy.
- All employees receive a refresher training on this policy at least once every financial year, with specific focus on the practical examples of Unauthenticated News, the prohibited channels of circulation, and the approval workflow under Section 7.
- Periodic communications and reminders are issued to employees to reinforce the prohibitions in this policy.
- Acknowledgements of receipt and understanding of this policy are obtained from all employees and recorded.

13. Roles and Responsibilities

- Board of Directors: Approves this policy; designates Authorised Personnel; reviews periodic reporting on compliance and breaches; takes ultimate responsibility for implementation.
- Compliance Officer (Mr. Rajkumar Pandey): Owns this policy; approves forwarding of market-related news under Section 7; supervises access by Authorised Personnel; conducts enquiries into breaches; coordinates with the Surveillance / SORM function on alerts arising from unauthenticated news; reports to the Board.
- Research / Dealing / Sales Heads: Ensure that personnel under their supervision comply with this policy; cooperate with the Compliance Officer in enquiries; do not encourage or tolerate circulation of unverified market information.
- Information Technology Function: Maintains email and message archives; supports monitoring of communications channels in a manner permitted by applicable law; preserves logs required for review of compliance with this policy.
- All employees: Comply with the core prohibition in Section 5; verify and (where required) obtain Compliance Officer approval before forwarding any market-related information; refrain from access to chat forums and messenger sites in connection with the Company's business unless authorised; report any breach by other employees to the Compliance Officer.

14. Reporting and Review

The Compliance Officer shall present to the Board:

- A quarterly summary of approvals issued for forwarding of market-related news, alerts arising from possible circulation of unauthenticated news, and any disciplinary action taken under this policy.
- Any communication received from SEBI or the Exchanges in respect of unauthenticated news activity and the response.

This policy shall be reviewed annually and amended in response to any change in the SEBI surveillance circulars or learning from operational experience.

Annexure A — Employee Acknowledgement Template

To be signed by every employee on receipt of this policy at induction and on each subsequent annual refresher training.

I, [Employee Name], [Designation], hereby acknowledge that:

1. I have received, read and understood the Unauthenticated News Policy v2.0 of Pawan Parmeshwar Capital Pvt Ltd.

2. I understand the core prohibition on origination, forwarding or circulation of Unauthenticated News through any mode of communication, including personal devices, personal email, WhatsApp, Telegram, social media and other messaging applications.

3. I understand the requirement to obtain the prior approval of the Compliance Officer before forwarding any market-related news, view, recommendation or analysis to clients or external parties.

4. I understand that access to chat forums and messenger sites in connection with the Company's business is restricted to Authorised Personnel designated by the Board, and that I shall not access such platforms in connection with the Company's business unless I have been so authorised.

5. I understand that breach of this policy may lead to disciplinary action including termination of employment, and that Para 2.3.5 of the SEBI Master Circular on Surveillance of Securities Market dated September 23, 2024 makes me personally liable for action by SEBI in the event of breach.

6. I agree to comply with this policy at all times.

Signature: ____________________________

Name: _______________________________

Designation: __________________________

Date: _______________________________

Annexure B — Register of Compliance Officer Approvals (Template)

To be maintained by the Compliance Officer.

Field	Particulars
Serial Number	
Date of Request	
Requesting Employee	
Nature of Communication (News / View / Recommendation / Other)	
Subject Matter (Security / Issuer / Market Event)	
Source of Information	
Verification Performed	
Proposed Recipients / Channel	
Approved / Declined / Approved with Modifications	
Date of Decision	
Compliance Officer Sign-Off	
Remarks	

Board Approval

This Unauthenticated News Policy (2.0) has been reviewed and approved by the Board of Directors of Pawan Parmeshwar Capital Pvt Ltd at its meeting held on 16-10-2025.

The Board has also recorded, on the same date, the following:

- The Board notes that this policy constitutes the Internal Code of Conduct required to be adopted by every SEBI-registered market intermediary under SEBI Circular Cir/ISD/1/2011 dated March 23, 2011 (consolidated in Para 2.3 of the SEBI Master Circular on Surveillance of Securities Market dated September 23, 2024).
- The Board confirms Mr. Rajkumar Pandey as the policy owner and Compliance Officer responsible for implementation, approval of forwarding of market-related communications, and reporting.
- The Board notes Para 2.3.5 of the SEBI Master Circular, which makes both the employee involved in circulation and the Compliance Officer liable for action, and the personal nature of such liability.
- The Board shall designate Authorised Personnel for access to chat forums, messenger sites and similar platforms under Section 8 of this policy by a separate Board resolution, naming the personnel and platforms. Until such designation, no employee shall access such platforms in connection with the Company's business.
- Cross-references to related policies (Mobile Phone Usage Policy v1.0, Insider Trading Code v2.0, Conflicts of Interest Policy v2.1, Order Acceptance Policy v2.0, SORM Policy v2.0, AML/PMLA Policy v2.0, Risk Management and Surveillance Policy v2.0, Registers and Records Manual v1.0) are noted.

For PAWAN PARMESHWAR CAPITAL PVT. LTD.

P K Choudhary

Director / Authorised Signatory

PAWAN PARMESHWAR CAPITAL PVT. LTD. MUMBAI

Director / Authorised Signatory

Name: Pawankumar Choudhary

Designation: Director

Date: 16-10-2025

Place: Mumbai