

WEALTHSTREET FINANCIAL SERVICES PRIVATE LIMITED

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## PREVENTION OF CIRCULATION OF UNAUTHORIZED INFORMATION BY STAFF POLICY

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<b>Policy Version</b>	2.0
<b>Effective Date</b>	25.03.2026
<b>Review Frequency</b>	Annually or upon regulatory change
<b>Prepared By</b>	Compliance Department
<b>First Approval</b>	Operations Committee
<b>Final Approval</b>	Internal Committee/ Board of Directors

**Wealthstreet Financial Services Private Limited**

*Formerly Known as Wealthstreet Advisors Private Limited*

**CIN: U74999GJ2016PTC094432**

**Regd. Off :** A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

**P :** +91 79 66775500 • **E :** info@wealthstreet.in • **W :** www.wealthstreet.in

## 1. INTRODUCTION

Wealthstreet Financial Services Private Limited (“the Company”) is committed to maintaining the highest standards of integrity, confidentiality, and regulatory compliance. This Policy is framed in accordance with applicable SEBI and Exchange regulations to prevent dissemination of unauthorized or misleading information by employees and associated persons.

## 2. OBJECTIVE

The objective of this Policy is to ensure that all communications made on behalf of the Company are accurate, authorized, and compliant, and to prevent any activity that may adversely impact investor interests or market integrity.

## 3. SCOPE AND APPLICABILITY

This Policy shall apply to all employees, dealers, relationship managers, authorized persons (APs), and any individual or entity acting on behalf of the Company.

## 4. DEFINITION OF UNAUTHORIZED INFORMATION

Unauthorized information shall include, but not be limited to:

- Unverified stock tips, recommendations, or market rumours
- Misleading or exaggerated statements regarding returns or performance
- Confidential client data or transaction details
- Internal business information not approved for public dissemination
- Any communication not routed through official Company channels

## 5. PROHIBITED ACTIVITIES

No employee or associated person shall:

- Circulate or share investment advice, tips, or recommendations without authorization
- Forward or endorse market rumours or unverified information through any medium
- Disclose client or Company confidential information to unauthorized persons
- Make false, misleading, or unsubstantiated claims to clients
- Engage in any communication that may influence client decisions without proper approval

## 6. APPROVED COMMUNICATION FRAMEWORK

All client-related communication shall be conducted strictly through Company-approved channels, including official email IDs, recorded telephone lines, and authorized systems.

No communication having regulatory or advisory implications shall be issued without prior approval from the Compliance function.

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## **7. SOCIAL MEDIA AND DIGITAL COMMUNICATION CONTROL**

Use of personal messaging platforms (such as WhatsApp, Telegram, Signal) or social media for client communication, trade instructions, or dissemination of market-related information is strictly prohibited unless specifically approved, monitored, and recorded by the Company.

## **8. CALL RECORDING AND AUDIT TRAIL**

All order instructions and client interactions shall be routed only through recorded lines or approved systems.

The Company shall maintain complete audit trails, including call recordings, email correspondence, and system logs, in accordance with SEBI and Exchange requirements.

## **9. RESTRICTION ON UNAUTHORIZED ADVISORY**

No employee or associated person shall provide investment advice, research recommendations, or portfolio guidance unless duly authorized and permitted under applicable SEBI regulations. Any such activity shall be treated as a serious violation.

## **10. MONITORING, SURVEILLANCE AND REPORTING**

The Compliance Department shall establish appropriate monitoring mechanisms, including periodic review of communications, complaint analysis, and surveillance checks.

Any suspected or confirmed breach shall be investigated promptly, and material violations shall be reported to regulatory authorities, wherever required.

## **11. DISCIPLINARY ACTION**

Violation of this Policy shall attract strict disciplinary action, which may include warning, suspension, financial penalty, termination of employment or association, and reporting to SEBI or Stock Exchanges, as applicable.

## **12. POLICY REVIEW AND GOVERNANCE**

This Policy shall be reviewed annually or upon any regulatory change. Any amendments shall be approved by the Board of Directors.

This Policy shall be read in conjunction with the Company's Code of Conduct and other applicable internal policies.

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