

BLOG CHAT POLICY

Effective Date: As per SEBI Circular | **Classification:** Mandatory Compliance | **Applies to:** All Trading Clients

1. Preamble

Skywards Investec Private Limited (“the Company”), operating under the brand name Bullsmart, is a SEBI-registered stock broker and is committed to maintaining fair market conduct, investor protection, and regulatory compliance.

This Policy is framed in line with the principles prescribed by the Securities and Exchange Board of India to prevent market abuse, including dissemination of false or misleading information that may impact securities prices.

2. Objective

The objectives of this Policy are to:

- Prevent circulation of unverified, price-sensitive, or misleading information
- Mitigate risks of market manipulation and insider trading
- Ensure controlled and compliant communication across digital platforms
- Protect investor interests and maintain market integrity

3. Scope and Applicability

This Policy applies to:

- Directors and Key Managerial Personnel
- All employees (permanent, contractual, trainees)
- Authorized Persons and business associates
- Any person acting on behalf of the Company

The Policy covers all forms of communication, including:

- Blogs and online articles
- Social media platforms (WhatsApp, Telegram, LinkedIn, Twitter, etc.)
- Chat/messaging platforms
- Emails and discussion forums

4. Regulatory Framework

This Policy is aligned with:

- SEBI (Stock Brokers) Regulations

- SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations
- SEBI (Prohibition of Insider Trading) Regulations
- SEBI circulars on market conduct, research dissemination, and communication controls.

5. Prohibited Conduct

No employee or associated person shall:

5.1 Dissemination of Unverified Information

- Circulate rumors, stock tips, or unverified market news
- Share unauthenticated or speculative information about securities
- Forward market-related messages received from any source without verification and approval

5.2 Market Influence Activities

- Make statements or posts that may directly or indirectly influence security prices
- Engage in discussions intended to create artificial demand or supply

5.3 Misrepresentation

- Represent personal views as official views of Bullsmart
- Act as an authorized spokesperson without approval.

6. Communication Approval Mechanism

All market-related communications must be pre-approved by the Compliance Officer

This includes:

- Blogs and articles
- Social media posts
- Client communications containing market views
- Research-related commentary

Approval must be:

- Documented (email/recorded system approval)
- Retained for audit and inspection purposes.

7. Control over Digital Communication Channels

The Company shall implement restricted and monitored access to:

- Social media platforms

- Chat and messaging applications
- Use of official communication channels for unauthorized activities is strictly prohibited
- IT systems may log and monitor usage in line with regulatory requirements.

8. Reporting and Escalation

All employees and associated persons must:

- Immediately report:
- Receipt of unverified or suspicious market information
- Any attempt to circulate rumors or manipulate market perception

Reports shall be made to:

- Compliance Officer / Compliance Team
- Failure to report shall be treated as a violation.

9. Record Maintenance

All approved communications must be archived and retrievable Logs of:

- Approvals
- Communications
- Monitoring activities

shall be maintained as per SEBI record-keeping requirements

10. Monitoring and Surveillance

The Company shall:

- Implement surveillance mechanisms to monitor communication channels
- Conduct periodic reviews of:
- Email communications
- Social media activity (where applicable)
- Ensure early detection of potential violations.

11. Disciplinary Action

Non-compliance with this Policy may result in:

- Warning or written reprimand
- Suspension or termination of employment/association
- Monetary penalties, where applicable
- Reporting to regulatory authorities, including SEBI
- Serious violations may attract action under applicable securities laws.

12. Roles and Responsibilities

12.1 Employees / Associated Persons

- Adhere strictly to this Policy
- Avoid dissemination of unverified information
- Report suspicious communications

12.2 Compliance Officer

- Review and approve communications
- Maintain records and audit trails
- Monitor compliance and report breaches
- Ensure alignment with SEBI regulations

13. Training and Awareness

Periodic training programs shall be conducted on:

- Market conduct
- Communication guidelines
- SEBI regulations
- Employees shall be made aware of risks relating to misuse of digital communication platforms

14. Review and Amendments

This Policy shall be:

- Reviewed periodically by the Compliance Officer
- Updated in line with regulatory changes and SEBI circulars

15. Declaration

- All employees and associated persons shall:
- Acknowledge having read and understood this Policy
- Confirm compliance on an ongoing basis

16. Key Principle

No unverified, unapproved, or price-sensitive information shall be created, shared, or circulated by any person associated with Bullsmart.