



FINAAX CAPITAL ADVISORS PRIVATE LIMITED

CHINESE WALL POLICY

EFFECTIVE FROM DECEMBER 05, 2024

1. Purpose

The Chinese Wall Policy of Finaax Capital Advisors Private Limited (“the Company”) is designed to maintain confidentiality, integrity, and trust in all business activities by preventing the unauthorized flow of sensitive information between different departments within the organization.

2. Scope

This policy applies to all employees, contractors, and affiliates of Shannon Advisors Private Limited who have access to sensitive or confidential information as part of their roles and responsibilities.

3. Definitions

- **Chinese Wall:** Refers to the virtual barrier established within the Company to prevent the exchange of confidential information between different departments or individuals who may have conflicting interests.
- **Sensitive Information:** Includes, but is not limited to, client data, market insights, investment strategies, financial reports, research findings, and any proprietary information related to the Company's business activities.

4. Policy Guidelines

a) Information Segregation

- Employees must segregate sensitive information based on the nature of their work and avoid sharing such information with individuals or departments that do not have a legitimate need-to-know.
- Departments such as advisory, research, compliance, and trading must maintain separate databases and communication channels to prevent unauthorized access to sensitive data.

b) Access Control

- Access to sensitive information is restricted based on job roles and responsibilities.
- Employees must undergo training on data protection, confidentiality, and compliance with the Chinese Wall Policy.
- Any changes in access permissions must be authorized by the relevant department heads or the compliance team.

c) Communication Protocols

- Employees must use secure communication channels and follow designated protocols when sharing sensitive information within the organization.
- Written approvals or documented justifications may be required for the exchange of information across departments that are separated by the Chinese Wall.

d) Compliance Oversight

- The Compliance Department is responsible for overseeing the implementation and enforcement of the Chinese Wall Policy.
- Regular audits and monitoring activities will be conducted to ensure compliance with the policy guidelines.
- Any breaches, violations, or suspicious activities related to the Chinese Wall Policy must be reported to the Compliance Department immediately.

e) Training and Awareness

- The Company will provide regular training sessions and awareness programs to educate employees about the Chinese Wall Policy, confidentiality obligations, and ethical conduct.
- Employees are required to acknowledge their understanding and adherence to the policy during onboarding and at regular intervals as per the Company's training schedule.

5. Compliance Officer's Responsibility

Compliance Officer should assure that each new MBD staff member is apprised of the Firm's policies and procedures concerning the handling of confidential and proprietary information and the staff member's responsibilities to safeguard such information. Questions Concerning Policies and Procedures All questions or concerns Employee may have about the application of this Memorandum should be addressed to Compliance Officer. Requests for exceptions should also be referred to Compliance Officer. If Employee believe that Employee may have obtained or disclosed confidential or proprietary information in a manner not in accordance with the guidelines set forth in this Memorandum or the procedures set forth in the Chinese Wall Memorandum, Employee should promptly contact the Compliance Officer and should not use or further disclose the information.

6. Consequences of Non-Compliance

Violations of the Chinese Wall Policy may result in disciplinary action, including but not limited to warnings, suspension, termination of employment, and legal consequences in accordance with applicable laws and regulations.

7. Policy Review and Updates

This policy will be reviewed periodically to ensure its effectiveness and relevance. Updates or revisions to the Chinese Wall Policy will be communicated to all employees, and training will be provided as necessary to ensure compliance.

8. Acknowledgement

All Existing MBD Employees and New Joining MBD Employees will be required to sign a statement acknowledging this memorandum. All non-employee professional and contingent workers utilized by MBD must sign a confidentiality statement prior to commencement of work for MBD.