

BLOG CHAT, & INSTANT MESSAGING POLICY

1. Objective & Scope

This policy defines the permissible boundaries for creating, accessing, and distributing financial information via digital text platforms. It covers:

- **Public Outlets:** Corporate blogs, external financial forums (e.g., Moneycontrol, TradingView), and social media platforms.
 - **Instant Messaging (IM) & Chat Suites:** Official trading platform chat interfaces, WhatsApp Business, Slack, Microsoft Teams, and Telegram.
 - **Applicability:** All full-time employees, part-time consultants, equity dealers, research desks, and Authorized Persons (APs/Franchisees).
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2. General Principles & Core Restrictions

- **No Unapproved Technical/Fundamental Tips:** Employees must not broadcast buy, sell, or hold recommendations via blogs or chats unless the content is a verbatim reproduction of an officially released, compliance-approved Research Report.
 - **No Client Account Privacy Violations:** Sharing screenshots or text logs of client ledgers, order books, P&L statements, or KYC details on any blog, chat group, or personal channel is strictly prohibited.
 - **Absolute Prohibition of Assured Returns:** No staff member may promise fixed, assured, or risk-free returns over chat to convince clients to trade or resolve complaints.
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3. Operational Rules for Corporate Blogs

The corporate blog must function strictly as an educational and verified analytical platform:

- **The Pre-Publishing Workflow:** Every blog article, market commentary, or educational guide must be vetted and signed off by the **Compliance Officer** before going live.
- **Mandatory Standard Disclaimers:** All blog posts referencing market sectors or asset classes must prominently feature SEBI-mandated risk disclosures (e.g., *"Investments in the securities market are subject to market risks..."*).
- **Strict Source Anchoring:** If a blog post references corporate events (mergers, earnings, or demergers), the author must include direct hyperlinks to the official corporate announcements on the NSE/BSE websites [1.4]. Speculative or third-party media reports cannot be used as primary sources.

4. Code of Conduct for Chat & Instant Messengers

Instant messaging applications represent a high risk for unauthenticated news distribution and regulatory breaches [1.1].

4.1 Official WhatsApp Business & Corporate Chat Channels

- **Authorized Channels Only:** Staff may communicate with clients only via official, company-provided WhatsApp Business accounts or recorded corporate chat suites. The use of personal mobile numbers for client interaction is prohibited.
- **No Unregulated Broadcast Groups:** Creating broad public WhatsApp groups or Telegram channels to push daily trading calls is forbidden. Any customer group must be restricted to operational support or one-way administrative notifications.

4.2 Handling Market Rumors in Client Chats

[Client Asks About a Market Rumor in Chat]



[Dealer must respond with a Standard Corporate Script]:

"We do not comment on market speculation. Please refer only to official exchange disclosures."



[Log and Escalate the Interaction to the Principal Officer within 24 Hours]

5. Access Controls & IT Monitoring Rules

The IT Infrastructure department must implement strict technical firewalls on all corporate assets and office networks:

- **Application Whitelisting:** Access to personal web versions of WhatsApp, Telegram, Discord, and unauthorized financial chat rooms is completely blocked on all dealer terminals and office networks.
 - **Centralized Archival:** All authorized text chats, platform interactions, and business emails must be automatically archived on a secure server.
 - **The 8-Year Retention Mandate:** Chat transcripts and digital data logs must be stored in a non-rewritable format for at least **8 years** to comply with SEBI's regulatory inspection guidelines.
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6. Disciplinary Framework for Policy Breaches

Any employee found using blogs or chats to manipulate markets, circulate rumors [1.1], or leak confidential customer details will face immediate penalties:

- **Minor Breach (First instance of using an unauthorized personal channel for business):** Formal warning letter and mandatory retraining.
 - **Major Breach (Sharing unauthenticated stock tips or leaking financial data):** Immediate suspension of trading terminal access, financial fines, and termination of employment.
 - **External Reporting:** The broker will hand over chat transcripts to SEBI, the exchanges, or cybercrime cells if an internal probe confirms involvement in organized circular trading or market fraud.
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