

# SVK FINVALUE ADVISORS PRIVATE LIMITED

(CIN: U70200GJ2019PTC107045)

## Chinese Wall (Information Barrier) Policy of SVK Finvalue Advisors Private Limited

### 1. Purpose

This Chinese Wall Policy is established to ensure that SVK Finvalue Advisors Private Limited maintains strict controls over the flow of confidential information and prevents conflicts of interest within the organization.

### 2. Scope

This policy applies to all employees, officers, and third-party vendors of SVK Finvalue Advisors Private Limited who have access to non-public, sensitive information that could potentially lead to conflicts of interest.

### 3. Restricted Access

- Implement restricted access controls to ensure that only authorized personnel within each department have access to relevant information.
- Log and monitor access to sensitive information.

### 4. Confidential Information

#### 4.1 Definition

- Clearly define what constitutes confidential information within SVK Finvalue Advisors Private Limited, including but not limited to client information, transaction details, trading strategies, and unpublished research reports.

#### 4.2 Handling Procedures

- Provide guidelines on how confidential information should be handled, stored, and shared within the organization.
- Specify the need-to-know basis for information access.

### 5. Communication

#### 5.1 Restricted Communication

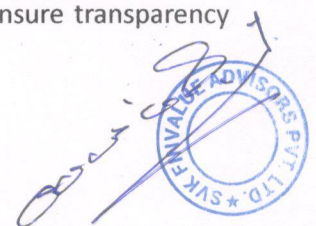
- Restrict communication between departments, especially those that might create conflicts of interest.
- Define approved channels and procedures for inter-departmental communication.

#### 5.2 Record-keeping

- Maintain records of all communication related to sensitive information to ensure transparency and compliance.

### 6. Training and Awareness

#### Employee Training



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- Conduct regular training sessions to educate employees about the Chinese Wall Policy and the importance of maintaining confidentiality.

## 7. Compliance Monitoring

### Surveillance

- Implement surveillance mechanisms to monitor compliance with the Chinese Wall Policy.
- Regularly audit and review access logs and communication records.

## 8. Reporting and Disciplinary Action

### Violations

- Establish procedures for reporting any violations or breaches of the Chinese Wall Policy.
- Specify disciplinary actions that will be taken in the event of violations.

## 9. Review and Amendments

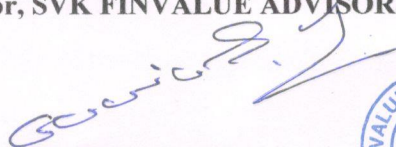
### 9.1 Policy Review

- Periodically review and update the Chinese Wall Policy to ensure alignment with industry best practices and regulatory requirements.

### 9.2 Amendments

- Communicate any policy amendments to all relevant personnel and ensure their understanding and compliant.

For, SVK FINVALUE ADVISORS PRIVATE LIMITED



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