



## **DIMENSION FINANCIAL SOLUTIONS PRIVATE LIMITED**

### **12.6 - Chinese Wall Policy**

#### **Introduction**

In financial services and merchant banking activity, a Chinese Wall is a virtual information barrier erected between those who have material, non-public information, and those who don't, to prevent conflicts of interest.

We, Dimension Financial Solutions Private Limited, as stock broker and trader of debt securities, may be in possession of material, non-public information concerning a publicly-traded company and are strictly prohibited from discussing any such information with individuals who do not have a need to know such information for the purpose of servicing the client that provided the information to the bank. We shall continue this policy for merchant banking activities also.

#### **Scope**

All employees including senior management and our affiliates who are directly involved in servicing the client, have access to sensitive and confidential information as a part of their role and responsibilities of a transaction, are covered under this policy. 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 clients' business activities.

#### **Bringing Employees Over the Chinese Wall**

- Under some circumstances, Our Company may be permitted to disclose material, non-public information to employees for valid business purposes in connection with a particular investment banking transaction. However, this can occur only in limited circumstances and only in consultation with the Compliance Officer.
- Depending upon the significance of the information and the context in which it will be used, Compliance Officer may recommend restrictions on the normal activities of the recipient of such information. Particular restraint should always be exercised with respect to the transmission of information that is not likely to become public during the course of an investment banking assignment. It may inhibit the ability of the recipient to engage in normal business activities (including personal trading) once the investment banking assignment is completed.

For Dimension Financial Solutions Pvt. Ltd.

Director



## **Policy Guidelines**

- Employees are required to segregate sensitive information based on the nature of their work and avoid sharing such information with individuals or departments that do not have a proper reason to know.
- Departments such as investment banking, advisory, compliance, and trading must maintain separate databases and communication channels to prevent unauthorized access to sensitive data.
- Any changes in access permissions must be authorized by the compliance officer.
- Approvals may be required for the exchange of information across departments that are separated by the Chinese Wall.
- The Compliance Officer is responsible for overseeing the implementation and enforcement of the Chinese Wall Policy.
- Any breaches, violations, or suspicious activities related to the Chinese Wall Policy must be reported to the Compliance Officer immediately.
- Our Company will provide regular guidance and awareness programs to educate employees about the Chinese Wall Policy, confidentiality obligations, and ethical conduct.

## **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.

## **Review/ Amendments to Policy**

The Policy would be reviewed on an annual basis by the Board of Directors or by the Committee of Directors designated for this purpose. In case, there are any regulatory changes requiring modifications to the Policy, the Policy shall be reviewed and amended with due approval from the Board of Directors/ Committee of Directors

For Dimension Financial Solutions Pvt. Ltd.



Director

