5PAISA CAPITAL LIMITED ("5paisa") - POLICY ON PREVENTION OF FRAUD ACTIVITIES AND IMPERSONATION BY THIRD PARTIES

1. Objective

This policy outlines proactive measures taken by 5paisa Capital Ltd. (hereinafter referred to as "5paisa") in timely detecting, preventing and responding to the fraud activities involving impersonation and other unauthorized use of the company's name, logo, brand identity, digital presence or unauthorised use of the names, designations and identities of the senior managerial personnel or any other officials of the company. Aligned with the directives laid down under the NSE circular "NSE/INSP/61754 dated 25th April 2024 and NSE circular NSE/INSP/65224 dated 25th November 2024 regarding "Submission of ATR on Impersonation and Unauthorized Market Practices" and guidelines issued by regulatory from time to time, this policy reflects our commitment to promptly address such activities and respond to complaints received via our customer support channels. The objective is to protect clients, maintain trust, and uphold 5paisa's brand reputation in accordance with all relevant regulatory and legal obligations.

2. Scope

This policy covers all cases of impersonation or unauthorized representation of 5paisa and/or its officials, through any medium, including but not limited to:

- Fraudulent websites
- Social media profiles
- WhatsApp groups
- Mobile applications
- Telegram groups
- Emails or any digital communication falsely affiliating with 5paisa or its officials

3. Periodic Review of Caution Notices

In accordance with SEBI's guidance, 5paisa's Legal Team periodically reviews the "Beware of Fraud" notice published on our official website. This review ensures the content is up to date, clearly communicates the risks of impersonation and fraudulent activity, and includes disclaimers clarifying that 5paisa holds no responsibility for losses arising from dealings with unauthorized entities.

4. Action Taken on Detection or Complaint

Whenever an instance of impersonation is identified either through our internal monitoring or customer complaints we take the following sequential steps, in compliance with NSE circular NSE/INSP/61754 dated 25th April 2024 and NSE circular NSE/INSP/65224 dated 25th November 2024 regarding "Submission of ATR on Impersonation and Unauthorized Market Practices" and any other guidelines issued by regulatory from time to time:

1. Publish a public notice on our website and/or through public media channels to warn investors and the general public.

2. Take immediate action as per SEBI and Exchange directives.
3. Escalate the matter to law enforcement or cybercrime authorities where applicable.

5. Cybersecurity Monitoring and Takedown Measures

5paisa's Cyber Defense Team continuously monitors the online ecosystem for fake or unauthorized digital properties. Upon identifying such threats, we promptly:

Initiate takedown requests with the relevant platforms (e.g., hosting providers, app stores, social media networks).

Internal Action – CDC Notification: Our Cyber Defense and Compliance (CDC) Team is immediately informed to initiate takedown efforts of the fraudulent website, group, mobile number, or application across relevant platforms.

Coordinate with government or law enforcement agencies as required for further investigation or legal action.

6. Customer Awareness and Fraud Response Measures

To safeguard and inform our customers, 5paisa has implemented the following measures:

Awareness Communication: We send awareness emails as an when it is required to all registered clients, educating them about ongoing fraudulent activities and impersonation attempts. These emails include information about detected fake platforms and strongly advise clients to interact only with 5paisa's verified and official digital channels.

Public Notices: We issue public notices in leading newspapers to raise broader awareness and caution the public against impersonation and fraud.

Website Alerts: A prominently placed cautionary notice titled "Beware of Fraud" is regularly displayed and updated on our official website to inform visitors about fraudulent activities and safeguard investor interests.

Cyber/Police Complaints: In cases of detected impersonation or fraudulent activity, we promptly file a complaint with the relevant cybercrime or police authorities.

Regulatory Compliance Reporting: In adherence to regulatory norms, an Action Taken Report (ATR) is submitted on the ENIT Portal within **three days** of lodging the cyber/police complaint, in compliance with SEBI guidelines.

Our aim is to reduce the risk of financial or personal harm through consistent and clear messaging.

7. Implementation and Oversight

The Legal Team, along with designated departments, is responsible for implementing this policy, ensuring timely action, incident resolution, and regulatory compliance. Our teams are fully committed to taking all necessary steps as and when required.

8. Policy Review

This policy is reviewed annually or earlier if mandated by changes in SEBI regulations or the emergence of new fraud risks. Updates will be incorporated to ensure continued effectiveness and alignment with the regulatory environment.