INTERNAL POLICY FOR CONTROLLING THE CIRCULATION OF UNAUTHENTIC NEWS OR RUMORS

(IMPLEMENTATION VERSION)

Finideas Growth Fund – Scheme 1
(Category III AIF registered with Securities and Exchange Board of India)

Version 2.0
Effective Date: 08 June 2026
Approved by: Board of the Investment Manager
Last Reviewed: 08 June 2026

1. OBJECTIVE AND REGULATORY CONTEXT

Finideas Growth Fund – Scheme 1 ("the Fund") has adopted and actively implements this Internal Policy to prevent, detect, and respond to the circulation of unauthentic news or rumors.

As a SEBI-registered Category III AIF, Finideas strictly adheres to the SEBI (AIF) Regulations, 2012 and the principles of fair disclosure under the SEBI (Prohibition of Insider Trading) Regulations, 2015. The Fund ensures that all communications are accurate, verified, and compliant with regulatory standards.

2. DEFINITION AND STRICT PROHIBITION

Finideas strictly prohibits the circulation of any false, misleading, speculative, manipulated, or unverified information relating to:

- Fund performance
- Investment strategy
- Regulatory matters
- Financial position
- Management decisions
- Investor communications

Both intentional and negligent dissemination of misinformation is treated as a violation under this Policy.

3. APPLICABILITY AND ENFORCEMENT

This Policy is binding on:

- Directors and Key Managerial Personnel
- Employees and Investment Team Members
- Compliance Personnel
- Consultants, Advisors, and Third-Party Service Providers

Finideas ensures that all covered persons formally acknowledge and adhere to this Policy. Compliance is monitored on an ongoing basis.

4. GOVERNANCE AND OVERSIGHT MECHANISM

The Board of the Investment Manager actively oversees communication governance and reputational risk management.

The Compliance Officer is responsible for:

- Monitoring adherence to communication standards
- Reviewing sensitive communications
- Investigating misinformation incidents
- Maintaining the Misinformation Incident Register

Only authorized spokesperson(s) designated by Finideas are permitted to communicate externally on behalf of the Fund.

5. SOURCE VERIFICATION AND CONTROL FRAMEWORK

Finideas ensures that:

- All internal and external communications are based on verified and approved data
- Fund performance figures are released only after validation
- Regulatory or compliance-related matters are cleared by the Compliance Officer
- No draft, speculative, or incomplete information is circulated

Employees are required to seek confirmation from Compliance before sharing any information where doubt exists.

6. INTERNAL COMMUNICATION CONTROLS

Finideas maintains strict internal controls to prevent unauthorized circulation of sensitive information. These include:

- Access restrictions to confidential data

- Information barriers where necessary
- Controlled distribution lists for sensitive communications
- Periodic review of internal communication practices

Speculative discussions, rumors, or unverified news are not permitted within internal communication channels.

7. EXTERNAL COMMUNICATION PROTOCOL

Finideas ensures that:

- All investor communications align with the Private Placement Memorandum (PPM) and regulatory filings
- Only designated officials respond to media or regulatory queries
- Social media usage by employees does not include confidential or sensitive fund-related matters
- No employee makes public statements that may be interpreted as official communication

Any external clarification regarding misinformation is issued in a structured, documented, and legally reviewed manner.

8. MONITORING AND SURVEILLANCE

Finideas actively monitors:

- Media coverage
- Investor communications
- Public references to the Fund
- Internal reporting channels

The Compliance Officer reviews potential misinformation risks and ensures prompt escalation where required.

9. REPORTING AND ESCALATION MECHANISM

Finideas has implemented a formal reporting structure whereby:

- Employees must immediately report suspected misinformation
- Reports may be made confidentially
- All incidents are logged in a maintained register
- The Compliance Officer evaluates materiality and potential regulatory implications

Escalation to senior management or the Board is undertaken where the matter is significant.

10. RESPONSE AND CORRECTIVE ACTION

Upon identifying misinformation, Finideas takes immediate corrective measures, which may include:

- Issuing investor clarification
- Publishing corrective statements
- Notifying regulators, where required
- Seeking legal recourse against malicious dissemination

All corrective steps are documented and proportionate to the impact risk.

11. CRISIS MANAGEMENT FRAMEWORK

In cases of material reputational or investor risk, Finideas activates a structured crisis communication protocol involving:

- Senior Management
- Compliance Officer
- Legal Advisors

The Fund prioritizes transparent and timely communication to protect investor interests.

12. DATA SECURITY AND INFORMATION PROTECTION

Finideas implements robust IT security and access control systems to prevent unauthorized access, tampering, or leakage of information.

Periodic system reviews and access audits are conducted to ensure data integrity and confidentiality.

13. DISCIPLINARY ACTION AND ZERO-TOLERANCE APPROACH

Finideas enforces a zero-tolerance policy toward intentional or negligent dissemination of unauthentic news.

Violations may result in:

- Written warnings
- Mandatory retraining
- Suspension or termination
- Regulatory reporting where required

Serious violations may attract legal consequences.

14. DOCUMENTATION AND RECORD RETENTION

Finideas maintains comprehensive documentation of:

- Reported incidents

- Investigation findings
- Corrective measures
- Board-level escalations

All records are retained for a minimum period of eight years or as required under applicable regulations.

15. TRAINING AND AWARENESS

Finideas conducts periodic awareness initiatives and internal guidance sessions to reinforce responsible communication standards.

Employees are regularly reminded of regulatory implications and reputational risks associated with misinformation.

16. POLICY REVIEW AND CONTINUOUS IMPROVEMENT

This Policy is reviewed annually or earlier if regulatory amendments or operational changes require revision.

The Board of the Investment Manager approves any amendments. Lessons learned from incidents are incorporated into procedural improvements.

CONCLUSION

Finideas Growth Fund – Scheme 1 actively implements and enforces this Policy to ensure accuracy, transparency, and regulatory compliance in all communications.

Through structured governance, strong oversight, proactive monitoring, and strict enforcement measures, Finideas safeguards investor trust, protects market integrity, and upholds the highest standards of responsible communication.

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