



# RELIGO CAPITAL ADVISORS

## **Policy for Merchant Banking: Chinese Wall Mechanism**

### **Introduction:**

The organization adheres to the principle of maintaining confidentiality and preventing conflicts of interest in its merchant banking activities. A Chinese Wall mechanism is implemented to segregate sensitive information and ensure it is only accessible to authorized personnel.

### **Objective:**

- To ensure segregation of information between different departments to prevent misuse of sensitive or material non-public information.
- To comply with regulatory guidelines and maintain the integrity of the organization's operations.

### **Scope:**

This policy applies to all employees, departments, and operations involved in merchant banking activities or handling confidential client information.

### **Key Features of the Chinese Wall Mechanism:**

#### **1. Physical and Operational Separation:**

- Departments dealing with confidential or material non-public information are physically and operationally segregated from other departments.

#### **2. Access Control:**

- Access to sensitive information is restricted to authorized personnel based on their roles and responsibilities.
- Secure login credentials and data encryption methods are utilized to protect electronic information.

#### **3. Information Flow:**

- Information flows between segregated departments only when absolutely necessary and with proper approvals.
- A record of such information sharing, including the rationale and authorization, is maintained.

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**RELIGO CAPITAL ADVISORS PRIVATE LIMITED**



901, Shivarth - The Ace, Sindhu Bhavan Road,  
Sindhu Bhavan, Ahmedabad, Gujarat-380054

**CIN NO.-** U66190GJ2024PTC152088



+91 90168 08671  
+91 92282 10707



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## 4. Training and Awareness:

- Employees are regularly trained on compliance requirements, confidentiality, and the importance of adhering to the Chinese Wall policy.

## 5. Monitoring and Audits:

- Regular monitoring and audits are conducted to ensure adherence to the policy.
- Any breach or potential breach of the Chinese Wall mechanism is escalated to senior management and corrective action is taken promptly.

## Responsibilities:

- **Compliance Officer:** Responsible for overseeing the implementation and monitoring of the Chinese Wall mechanism.
- **Department Heads:** Ensure that their respective teams adhere to the segregation and confidentiality requirements.
- **Employees:** Abide by the policy and report any breaches or concerns.

## Review and Updates:

This policy will be reviewed periodically and updated as required to align with regulatory changes or organizational needs.

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