



***OUR PATH - YOUR SUCCESS***

**3Dimension Capital Services Limited**

**SEBI Registered (Category - 1) Merchant Banker**

## **CHINESE WALL POLICY**

### **(As per the requirement of Regulation of SEBI (Merchant Bankers) Regulations, 1992)**

(i) The document has been prepared in accordance with the Securities and Exchange Board of India (Merchant Bankers) Regulations, 1992, as amended from time to time as per the requirement.

(ii) The purpose of the Document is to provide essential information about the Merchant Banking Services in a manner to assist and enable the investors/clients in making an informed decision for engaging a Merchant Banker.

(iii) The document contains necessary information about the Merchant Banker required by an investors/client before availing services, and the investors/clients may also be advised to retain the document for future reference.

(iv) This Document is dated 25-02-2026. (The Policy will be effective from April 1, 2026)

#### **Details of the Merchant Banker**

Name of Merchant Banker	3Dimension Capital Services Limited
SEBI Registration Number	INM000012528
Registered Office Address	K-37A, Basement, Kailash Colony, near Kailash colony metro station, New Delhi-110048
Phone No(s)	011-40196737
E-mail address	<a href="mailto:info@3dcsl.com">info@3dcsl.com</a>
Website	<a href="https://3dcsl.com/about-us/">https://3dcsl.com/about-us/</a>

#### **Details of the Compliance Officer**

Name of Compliance Officer	Lata Rani
E-mail Address	delhi@3dcsl.com

## **A. PURPOSE**

This Chinese Wall Policy (“Policy”) is adopted by **3Dimension Capital Services Limited** (“the Company”) to ensure effective segregation and operational independence between SEBI-regulated activities and non-SEBI regulated activities undertaken by the Company, in accordance with the applicable provisions of the SEBI (Merchant Bankers) Regulations, 1992, SEBI (Prohibition of Insider Trading) Regulations, 2015, and other regulatory amendments issued from time to time.

The Policy establishes a robust internal control framework to create and maintain information barriers (“Chinese Walls”) within the organization so as to prevent misuse, leakage, or improper sharing of confidential and unpublished price sensitive information (UPSI). It aims to safeguard investor interests, maintain market integrity, and ensure that the Company conducts its activities in a fair, transparent, and compliant manner.

The objective of this Policy is to:

- (a) Prevent sharing of Unpublished Price Sensitive Information (UPSI)
- (b) Avoid client data crossover
- (c) Eliminate conflict of interest
- (d) Ring-fence SEBI regulated activities
- (e) Ensure transparency and regulatory compliance

This Policy shall be binding on all Directors, Key Managerial Personnel, employees, and associated persons of the Company, and any violation shall attract appropriate disciplinary and regulatory consequences.

## **B. SCOPE AND APPLICABILITY**

- (a) All business units and Strategic Business Units (SBUs) of the Company, including those engaged in SEBI-regulated as well as non-SEBI regulated activities;
- (b) All Directors, including Independent Directors;
- (c) All Key Managerial Personnel (KMP);
- (d) All employees of the Company, whether permanent, temporary, probationary, deputed, or retained on contract;
- (e) All consultants, advisors, retainers, intermediaries, and other persons associated with the Company who may have access to confidential information or Unpublished Price Sensitive Information (UPSI);
- (f) All information technology systems, servers, databases, shared drives, document management systems, communication platforms, email systems, and any other data repositories or communication channels used by the Company.

Every person covered under this Policy shall be responsible for ensuring strict adherence to the information barrier controls, confidentiality obligations, and segregation requirements prescribed herein.

### **C. SEGREGATION OF BUSINESS UNITS**

The Company shall maintain Separate Business Units (SBUs) for:

1. SEBI Regulated Activities
2. Non- SEBI Regulated Activities

Each SBU shall function independently with clearly defined roles and responsibilities.

### **D. RING-FENCING OF SEBI REGULATED ACTIVITIES**

The SEBI regulated business shall be ring-fenced through the following measures:

#### **(i) Separate Staff**

- Staff handling SEBI regulated activities shall be distinct from those engaged in non-SEBI regulated activities.
- Separate deal teams shall be constituted.
- Separate reporting lines shall be maintained.

#### **(ii) Separate Deal Management**

- Separate deal files.
- Separate Documentation
- Independent Transaction records

#### **(iii) Separate Revenue Tracking**

- Independent accounting and revenue reporting for each SBU.

#### **(iv) Separate IT Access**

- Restricted access controls
- Segregated folders, shared drives, and document management systems
- Access granted strictly on a need-to-know basis
  
- Separate email groups and restricted communication channels

### **E. CHINESE WALL CONTROLS**

The following Controls shall be implemented:

(i) Prohibition on Sharing

- No Sharing of UPSI between SBUs
- No client data crossover
- No informal or verbal transmission of sensitive information

(ii) Controlled Crossing of the Wall

- Staff may cross the Chinese wall only with:
  - Prior approval as per procedures approved by the Board of Directors.
  - Documentation of purpose and duration.
  - Compliance Oversight
- Such approvals shall be recorded and achieved.

(iii) Exception for Key Managerial Personnel

- The Chinese Wall restrictions shall not apply to Key Managerial Personnel.
- However, KMP shall maintain Strict confidentiality and conflict management Standards.

**F. SHARED RESOURCES**

- IT infrastructure or other resources may be shared only with:
  - Prior Approval of the Board of Directors and the approval of the Board of Directors will be taken on the same day of approval of the policy.
  - Defined access controls and monitoring
- Shared Systems shall not compromise confidentiality or regulatory compliance.

**G. RECORD MAINTAINANCE**

- Separate Records shall be maintained for:
  - SEBI regulated activities
  - Non-SEBI regulated activities
- Records shall be stored in segregated systems with controlled access.
- Audit trails shall be preserved.

**H. DISCLOSURE REQUIREMENTS**

**(i) Website Disclosures-**

The Company shall disclose on its website:

- A list of activities that are not regulated by SEBI or any other Financial Sector Regulator (FSR).
- A clear statement that SEBI investor grievance redressal mechanism is not available for non-SEBI regulated activities.
- Details of the separate grievance redressal mechanism applicable to such activities.

(ii) Upfront Written Disclosure

Before undertaking any non-SEBI regulated activity, the Company shall provide written disclosure to:

- Clients
- Beneficiaries
- Counterparties

The disclosure shall include:

- Nature of the activity
- Risks involved
- Non-availability of SEBI investor protection mechanism

Such disclosure shall be documented and retained.

#### **I. COMPLIANCE WITH OTHER FINANCIAL SECTOR REGULATORS**

If the Company undertakes activities regulated by any other Financial Sector Regulator (FSR):

- Eligibility requirements of that regulator shall be complied with.
- Applicable regulatory norms shall be followed.
- Separate compliance monitoring shall be maintained.

#### **J. MARKETING AND ADVERTISING SEGREGATION**

The Company shall ensure:

- Separate marketing material for SEBI regulated activities.
- Separate webpage sections.
- Clear distinction between SEBI and non-SEBI activities.
- No mixing or co-branding that may mislead clients.

#### **K. TRADING RESTRICTIONS (RESTRICTED/GREY LIST)**

- Securities of listed companies for which the Company is handling assignments shall be placed on a Restricted/Grey List.
- Trading by employees/directors in such securities shall require pre-clearance from Compliance Officer.
- Compliance Officer may block or disallow such trades.

#### **L. CONFIDENTIALITY OBLIGATION**

All Confidential Information shall be kept strictly confidential and shall only be disclosed:

- As required by law
- To regulatory authorities
- Under approved internal procedures

#### **M. MONITORING AND ENFORCEMENT**

##### (i) Monitoring

- Compliance Officer shall monitor implementation.
- Periodic internal audits shall be conducted.
- Deviations shall be documented and reported.

##### (ii) Disciplinary Action

- Violation of this Policy may result in:
- Disciplinary action
- Monetary penalties
- Termination of employment
- Reporting to regulatory authorities

#### **N. BOARD APPROVAL AND REVIEW**

This Policy:

- Has been approved by the Board of Directors.
- Shall be reviewed annually or upon regulatory amendments.