CODE OF ADVERTISEMENT

This code of advertisement is prepared by Kunvarji Finstock Pvt. Ltd., Stock Broker and member of NSE, BSE and MSEI registered with SEBI as such vide SEBI Registration No. INZ000180436 on 30.11.2016.

The code is updated on 10.02.2020.

The code is property of Kunvarji Finstock Pvt. Ltd.

1. Requirement prescribed

Prior to putting out any advertisement, approval of Stock Exchanges viz. NSE, BSE and MSEI is required to be obtained. Such prior approval is to be applied for on the portals provided by the Exchanges.

2. What is advertisement?

- 2.1 Advertisement is any communication that promotes products/services/ brokerage plans or any other content which amounts to solicitations for account opening or availing services of KFPL. Brand Promotion is also considered as advertisement.
- 2.2 Advertisement includes all forms of communications issued by or on behalf of Kunvarji Finstock Pvt. Ltd. in publicly available media that may influence investment/sale decision of any investor/prospective investor.
- 2.3 Form of communication shall include. Form of document, pamphlet, circular, brochure or any other literature or information, material published or designed for use in newspapers, magazines, SMS, periodical radio, television, video tape display, bill board, motion picture or other public media including website, or emails. Such communications could be in audio visual form or used in workshop/seminar or public speech.
- 2.4 Form of communication also includes posting on social media platforms including but not limited to Facebook, Twitter, Instagram, You Tube, WhatsApp etc.

- 2.5 Any display of awards received by KFPL from third party.
- 2.6 Any promotional material for promoting KFPL mobile trading application (With or without account opening or information of products/services).
- 2.7 Any posting on social media by any employee or associate of KFPL
- 2.8 Any advertisement jointly with third party or a group entity which includes brand promotion.
- 3. Mandatory requirement of including the following.
 - 3.1 All advertisement must include the following text in minimum 10 font size without any addition or deletion of words.
 - "Investment in securities market are subject to market risks, read all the related documents carefully before investing".
 - 3.2 The above text must be included in case of any visual media. In case of any audio media, the voice reiteration of this words should be clear and the iteration should not be shorter than five seconds.
 - 3.3 All advertisements must include full name, logo, registered office address, SEBI registration number apart from the above disclaimer/warning.
 - 3.4 In case of advertisement through SMS/ Message/ Pop-Up etc., the same should include hyperlink to official website of Kunvarji Finstock Pvt. Ltd. of the page containing the details of full name, logo, registered office address, SEBI registration number apart from the above disclaimer/warning.

- 3.5 If there are any terms and conditions applicable to the product or plan being advertised, the same should be either mentioned in the creative or be followed by the creative or an active link on the first page of creative should be provided leading to official website of KFPL page containing details of full name, logo, registered office address, SEBI registration number apart from the above disclaimer/warning.
- 4. What types of advertisement/publications do not require prior approval?
 - 4.1 Wishes/greetings on events/festivals wherein there is no mention of products/ services/ brokerage plans or any material soliciting business.
 - 4.2 Any content/advertisement for existing clients which is sent to client's address, email id or mobile number. Such material should contain the following sentence.

"The information is only for the consumption of the client and the same should not be redistributed".

- 4.3 Contents which are exclusively for Mutual Fund, Insurance or Investment Advisory Products of Uniquest Financial Research & Analytics Pvt. Ltd., or PMS.
- 4.4 Any advertisement which is approved by Exchange is reproduced or published on another medium, the same shall not require prior approval.
- 4.5 Any educational material including market commentary or discussion on economic news or event not containing any mention of KFPL products/

- services/ brokerage plans.
- 4.6 Any advertisement inviting application for employment with KFPL.
- 4.7 Any advertisement soliciting franchisee/authorised person.
- 5. Action to be taken by KFPL in case of unauthorized publication of any advertisement.
 - 5.1 In case of any posting of contents or advertisement which promotes products/brand/ services of KFPL or soliciting business for KFPL by any employee without authorization from KFPL shall invite disciplinary action by KFPL on the concerned employee which may entail warning, financial penalty, demotion or termination from employment depending upon severity and number of instances etc. depending on facts and circumstances of each case.
 - 5.2 In case of any posting of contents or advertisement which promotes products/brand/ services of KFPL or soliciting business for KFPL by any AP, KFPL shall initiate action against such AP which may include warning, financial penalty, or termination.
 - 5.3 In case of any posting of contents or advertisement which promotes products/brand/ services of KFPL or soliciting business for KFPL by any third party not related to KFPL, KFPL shall explore such legal remedy as available under law as may be advised.

- 6. Process for obtaining prior approval of Exchanges.
 - 6.1 To send soft copy of the advertisement/ creative to following email id.
 - 1. atul.chokshi@kunvarji.com
 - 2. legal@kunvarji.com
 - 3. <u>legal1@kunvarji.com</u>
 - 6.2 The size of soft copy of advertisement creating should not be greater than 8 MB and should be in any of the following format.

 .pdf/.bmp/.jpg/.jpeg/.doc/.docx/.mpeg/.zip/.tif/.xls/.xlsx.
 - 6.3 With each application, we are required to submit processing fees of Rs. 3,000/- plus applicable GST.
 - 6.4 Kindly mention the medium on which the advertisement is to be published.
 - 6.5 An approval is valid for 180 days only. Therefore, if the earlier approved advertisement is to be used again, ensure that not more than 180 days had elapsed since the approval date.
 - 6.6 If an advertisement is approved for one medium, the same can be used on another medium if there is no substantial change.