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## Brief Write-up on Data Backup, Storage and Security

The Company has adopted a **Chinese Wall Policy** to Ensure strict segregation of sensitive information and to prevent any conflict of interest in the course of its Merchant Banking and related business activities.

### Key Provisions:

- **Information Barriers:** Distinct functional areas are created to separate advisory, capital raising, and research activities, ensuring that Unpublished Price Sensitive Information (UPSI) does not flow across divisions.
- **Access Control:** Only authorized personal on a “need –to-know” basis are permitted to access sensitive information, with role-based restrictions and monitoring in place.
- **Physical & Electronic Safeguards:** Separate workspaces, Restricted IT Permissions, and secure communication channels are maintained to upload confidentiality.
- **Compliance Oversight:** The Compliance Officer monitors adherence to the Chinese Wall framework and records all instances where wall-crossing is permitted under regulatory approval.
- **Fair Market Conduct:** The Policy ensures that decisions regarding advisory, underwriting, or investment services are taken independently and free from influence of other business functions.

Through this mechanism, the Company ensures confidentiality, independence, and regulatory compliance, thereby protecting client interests and maintaining integrity of the capital markets.

For, Stepone Capital Advisors Private Limited

A handwritten signature in black ink is written over a circular blue stamp. The stamp contains the text "STEPONE CAPITAL ADVISORS PVT. LTD." around the perimeter and "AHMEDABAD" in the center. A small star is located at the bottom of the stamp.

Rohit Labana

DIN: 11075806

Place: Ahmedabad

Date: April 25, 2026



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