



Internal Advertising Policy

Introduction:

This document outlines the guidelines for creating and disseminating advertisements for SAS Online. The purpose of this policy is to ensure that all advertising materials are aligned with our brand identity, values, and legal regulations.

Objective:

Prior approval for all Advertisement should be obtained from the Exchange before issuance of Advertisement.

What is an **Advertisement** - All forms of communication issued by or on behalf of or in relation to Stockbroker in publicly available media **that may influence investment/trading decisions** of any investor/prospective investors.

It also includes **internal communication** to registered clients and content on **members website** that may influence investment/trading decisions.

Broad Guidelines:

What all things to take care while creating content/posts - We are adhering to our internal policy on advertisement as -

- Not to use any content or text that is prohibited like **sharing data without authentic source, use of celebrity, using any superlative terms**, such as best, no. 1, among market leaders, non-recommendation or promotion of a specific script /contract.
- Not to post any content on quiz or game which involves distribution of money/gifts/ prizes/ coupons etc
- Need to show - Name of the Member, complete registered office address, SEBI Registration number (all registration numbers and names of the Exchanges in case of multiple memberships) /Member ID allotted by Exchange and logo of the Member.
- Using of standard approved template for IPO, static content will be fixed and variable content will be authentic and as per DRHP.
- Not to use Name / Logo of exchanges or regulator.
- Not to use any influencer with more than 10 Lac followers on social media.
- Not to promote or advertise virtual trading or games. No promotion of LAS. No communication or pushing in-active clients to trade
- Not to promote mobile application (with or without account opening or Products/Services info) without prior Exchange approval.

- As Standard warning is mandatory now onwards, we are giving in images as in legible fonts (minimum font size 10) which states 'investments in the securities market are subject to market risks, read all the related documents carefully before investing.' No addition or deletion of words shall be made to the standard warning. Brokerage will not exceed the SEBI prescribed limit.
- To give the standard warning in visual and accompanying voice over reiteration shall be audible in a clear and understandable manner running for at least 5 sec.

Advertisements which do not require Exchange Approval

- For **educational/information** purposes, knowledge sharing / training has no influence on the investment/trading decisions of any investors, without giving any link of account opening.
- Any communication that is limited to **market commentary** concerning overall changes in the market on a particular day, or a discussion of economic news wherein there is no mention of any information that can influence the investment/trading decisions of any investor.
- **Wishes /Greetings** from the company on events/festivals by the Member which does not involve any form of promotional activities.
- **Press release/audio & video interviews by members** which cannot influence the investment/trading decisions of any investors.
- All public communications, **inviting applications for franchisees/authorized persons**, etc. to drive the business expansion of the Member, provided such communication does not have any information that can influence the investment/trading decisions of any investor.

For 3rd Party Advertising Guidelines & Recommendations -

- Need to do regular audits on partnered influencers to verify lead sources and prevent false/misleading statements or testimonials. Transparency and credibility are our priorities.

Few Other Norms:

Referral Schemes-

Need to look at rules with respect Referral given - Flat rate and no slabs allowed. Yes, different rates across different persons are allowed. Referral fee is payable one time without any conditions.

Algorithmic trading services/strategies-

Members who are providing algorithmic trading services/strategies as well as Members who feature in any of the platform offering such services are advised to refrain from making any reference to the ***past performance or expected return out of algorithmic trading services/strategies*** in any form of advertisements/business communication on publicly accessible platforms including and not limited to social media/websites/digital & print media etc directly or indirectly.