INCRED MARKETS LIMITED

POLICY ON PREVENTION OF MISUSE OF HEADERS AND CONTENT TEMPLATES

Policy Owner: Compliance Department
Applicable To: CDSL DP, NSDL DP and SEBI-regulated activities
Effective Date: 01.08.2025
Version: 1.0
Approved By: Board of Directors / Competent Authority

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1. OBJECTIVE

To establish controls for registration, use, monitoring and periodic review of **SMS Headers, Content Templates and customer communication channels**, and to prevent their unauthorized or fraudulent use.

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2. REGULATORY FRAMEWORK

This Policy shall be read with the applicable requirements of:

- **SEBI**
- **CDSL**
- **NSDL**
- **TRAI**
- **DoT**
- **TCCCPR, 2018**, as amended from time to time
- **CDSL Communiqué No. CDSL/OPS/DP/POLCY/2024/489 dated August 27, 2024**
- Applicable CDSL/NSDL circulars and directions issued from time to time.

In case of any regulatory change, the **latest applicable requirement shall prevail**.

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3. SCOPE

This Policy applies to all employees, departments, branches, vendors and service providers involved in sending:

- SMS and customer alerts;
- transactional/service communications;
- regulatory communications;
- communications containing URLs/APKs;
- IVR/voice communications; and
- other commercial communications.

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4. HEADER MANAGEMENT

InCred Markets Limited shall:

1. Use only **registered and approved Headers**.
2. Maintain a **Master Header Register**.
3. Ensure Headers are appropriately verified and mapped to the approved purpose.
4. Review Headers periodically and deactivate/close unused Headers.
5. Restrict access to DLT credentials and Header management systems.
6. Prohibit unauthorized creation, modification or use of Headers.

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5. CONTENT TEMPLATE MANAGEMENT

The Company shall:

1. Use only **registered and approved Content Templates**.
2. Maintain a **Master Content Template Register**.
3. Apply maker-checker/authorized approval controls.
4. Ensure modifications are reviewed and re-registered wherever required.
5. Periodically review and deactivate unused/obsolete Templates.
6. Ensure Templates are used only for their approved purpose.

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6. VARIABLE AND LINK CONTROL

The Company shall ensure that:

- Variables are used only for their approved purpose.
- Applicable regulatory limits on variables are followed.
- URLs, APKs, application links and other digital resources are **approved/whitelisted** before use.
- Unauthorized links or content cannot be inserted into approved Templates.

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7. CUSTOMER COMMUNICATION

The Company shall ensure that:

- Service/transactional communications are appropriately classified.
- Applicable customer consent and preference requirements are followed.
- DND/UCC requirements are complied with.
- Promotional communications are not sent through service/transactional Templates.
- Only approved communication channels are used.

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8. REGISTERED TELEMARKETERS / VENDORS

Where third-party vendors or Registered Telemarketers are used:

- Only authorized vendors shall be engaged.
- Applicable TCCCPR requirements shall be incorporated in vendor agreements.
- Vendor access shall be restricted.
- Vendor performance and communication records shall be periodically reviewed.
- Vendors shall not use Company Headers/Templates for any unauthorized purpose.

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9. VOICE COMMUNICATION

InCred Markets Limited shall comply with applicable **SEBI/TRAI requirements regarding the 1600-series** for service and transactional voice calls.

The Company shall maintain a record of approved numbers, purpose, service provider and status.

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10. ACCESS CONTROL

Access to DLT portals, Headers, Templates and communication platforms shall be restricted to authorized personnel.

User access shall be periodically reviewed and withdrawn immediately upon employee/vendor exit or change in responsibility.

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11. PERIODIC REVIEW

The Compliance Department shall conduct a **quarterly review** of:

- Headers;
- Content Templates;
- unused/obsolete Headers and Templates;
- URLs/APKs;
- vendors/telemarketers;
- communication samples;
- UCC complaints/incidents;
- access rights; and
- applicable regulatory requirements.

The review shall be documented and approved by the Compliance Officer/authorized official.

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12. MISUSE / INCIDENT MANAGEMENT

Any unauthorized use, suspected misuse, fraudulent communication, spam/UCC incident or security breach shall be immediately reported to the Compliance Department.

The Company shall, as appropriate:

- suspend/deactivate the affected Header/Template;
- investigate the incident;
- take corrective action;
- document the incident; and
- make regulatory reporting where required.

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13. INSPECTION & RECORDS

The following records shall be maintained and made available for **CDSL, NSDL and SEBI inspection**:

1. Approved Policy.
2. Master Header Register.
3. Master Content Template Register.
4. DLT registration/re-verification records.
5. Quarterly review/checklist.
6. URL/APK whitelist.
7. Vendor/RTM details.
8. Communication samples/logs.
9. UCC/incident register.
10. Compliance Officer certification.
11. Corrective action records.
12. Relevant regulatory correspondence.

For CDSL inspection, specific evidence of compliance with **CDSL Communiqué No. CDSL/OPS/DP/POLCY/2024/489 dated August 27, 2024** shall be maintained.

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14. RESPONSIBILITY

Compliance Department shall be responsible for monitoring and implementation of this Policy.

IT/Operations/Business Departments shall ensure that only approved Headers, Templates and communication channels are used.

All employees and vendors shall comply with this Policy.

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15. REVIEW OF POLICY

This Policy shall be reviewed **at least annually** or earlier in case of any change in applicable SEBI, CDSL, NSDL, TRAI or DoT requirements.

For InCred Markets Limited

Prepared By: Compliance Department
Reviewed By: IT Departments
Approved By: Board of Directors
Review Date: Annually
Version: 1.0