

WINVEST CAPITALS

Address – 401-A 4TH Floor, Gurudatta Plaza,
Beside HP Petrol pump, Ganesh Colony Road, Jalgaon,
Jalgaon (M Corp.), Jalgaon- 425001

Email Id: winvestcapitals25@gmail.com Phone Number: +919579557272

INTERNAL POLICIES, PROCEDURES, AND INTERNAL CONTROL FRAMEWORK

*(Drafted in compliance with Chapter III of SEBI (Research Analysts) Regulations,
2014)*

1. Objective & Scope

This framework outlines the internal controls governing my operations as an independent Research Analyst. The purpose is to ensure absolute objectivity, prevent market abuse, eliminate conflicts of interest, and protect public investors.

2. Conflict of Interest Management

- **Personal Trading Disclosures:** I will fully disclose any direct or indirect financial interest, shareholding (exceeding 1%), or material relationship held by myself or my family members in any subject company at the bottom of every research report.
- **No Corporate Incentives:** I do not provide investment banking, merchant banking, or brokerage services. I do not receive any compensation or gratuity from the management of companies under my coverage.
- **Unbiased Pricing:** My subscription or service fees are fixed independently and are never tied to the trading volumes, market movements, or profitability of client portfolios.

3. Personal Trading Restrictions (SOP)

To maintain complete integrity, I strictly enforce the following personal trading timeline:

- **The 30-Day Pre-Report Freeze:** I will not buy, sell, or trade any security within 30 days prior to publishing a research report or trading call on that specific stock.
- **The 5-Day Post-Report Freeze:** I will not trade any recommended security for 5 days after publishing the research report or trading call.
- **No Contrarian Trading:** I will never execute a personal trade that goes against my active recommendation (e.g., selling a stock while advising clients to "Buy").

4. Research Methodology and Maintenance of Records

- **Objective Basis:** All recommendations, stock valuation models, and target prices will be backed by verified public facts, earnings reports, or rigorous quantitative analysis.

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- **Data Security:** I will preserve a comprehensive digital log containing all published reports, underlying data sheets, valuation rationales, and communications sent to clients.
- **5-Year Retention:** All documentation will be securely archived and maintained for a minimum of 5 years, remaining readily available for SEBI inspection.

5. Statutory Annual Audit

- I will appoint an independent, external Chartered Accountant (ICAI) or Company Secretary (ICSI) to conduct an annual compliance audit within six months of the end of each financial year.

Date: 01-04-2026

Place: Jalgaon

SHOEB ABDUL RAHIM SHAIKH

PROPRIETOR OF WINVEST CAPITALS

Proprietor & SEBI Registered Research Analyst