



NEXOME CAPITAL MARKETS LIMITED
(FORMERLY SMIFS CAPITAL MARKETS LIMITED)

POLICY ON CYBER SECURITY AND DATA PRIVACY POLICY

Pursuant to of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and other applicable provisions (if any).

[approved by the Board of Directors on June 04, 2025]

Regd. Office: Vaibhav, 4F, 4 Lee Road, Kolkata- 700020

Nexome Capital Markets Limited (Formerly SMIFS Capital Markets Limited) recognizes the importance of cyber security and data privacy in ensuring sustainable growth and business continuity across the organization. Information systems and data resources of NCML are critically important assets for its business operations and effective customer services.

Nexome Capital Markets Limited (Formerly SMIFS Capital Markets Limited) is committed to establishing and improving cyber security preparedness and minimizing its exposure to associated risks to safeguard NCML assets. All the businesses and functions of the Company will implement adequate security policies, processes, and controls to protect confidentiality, maintain integrity, and ensure availability of all information assets.

This policy requires all Businesses under Nexome Capital Markets Limited

(Formerly SMIFS Capital Markets Limited):

- To comply with the applicable national and international cyber security standards.
- To implement control and monitor measures for all hardware and software assets in use throughout the organization.
- Implement management protocols for protection and security of stakeholder assets.
- To identify risks to information and cyber systems and mitigate to acceptable level through a formal documented procedure.
- To protect critical information from unauthorized access, use, disclosure, modification, and disposal, whether intentional or unintentional.
- The confidentiality, integrity and availability of such information acquired permanently or in transit, provided or created are always ensured.
- To conduct regular cyber-security audits following appropriate national and international standards to maintain compliance.
- To establish clear-cut reporting channels for any form of violation of the Cyber Security and Data Privacy policies and any other specific information security and management policy as the case may be.
- To protect Nexome Capital Markets Limited stakeholders, information and assets from threats that could potentially disrupt its business, brand and reputation.
- To communicate the importance of cyber security and to continually enhance information security capabilities to all the concerned.

- To collaborate with cyber security and data privacy experts to continually upgrade the information management infrastructure.
- All Business Heads/Department Heads are directly responsible for ensuring compliance with this policy in their respective business domains.
- All breaches of information security, actual or suspected, are reported, investigated by the designated personnel and appropriate corrective and preventive actions initiated.

This policy applies to all stakeholders who access Nexome Capital Markets Limited's information or networks: Full Time Employees (FTE), Off- roll employees, including but not limited to subsidiary staff, contractors, consultants, temporary staff affiliated with third parties, including system vendors and staff from outsourcing companies.

This policy also applies to all information, computer, and data communication systems owned, licensed, and administered by Nexome Capital Markets Limited (Formerly SMIFS Capital Markets Limited) or its service providers and covers manifestations of other Nexome Capital Markets Limited's information such as voice and data.

The content and robustness of implementation of this policy will be reviewed periodically and revised accordingly, as needed.