

POLICY ON CONFLICT OF INTEREST

This policy on Conflict of Interest has been prepared by the company with reference to SEBI Circular No. CIR/MIRSD/5/2013 dated August 27, 2013 which has been approved by Board of Directors.

All employees (including senior level employee) of the company shall follow, at all the times, the guidelines in order to deal with conflict of interest situations as enumerated herein below:

1. To follow the internal code of conduct governing operations and formulate standards of appropriate conduct in the performance of our activities.
2. To maintain, at all times, high standards of integrity in the code of conduct of our business.
3. To ensure fair treatment of our clients and not discriminate amongst them.
4. To ensure that personal interest of employees of Company will not, at any time, be in conflict with their duty to the clients of the company and client's interest always takes primacy w.r.t advice, investment decisions and transactions.
5. To make appropriate disclosure to the clients of the Company of possible source or potential areas of conflict of interest which would impair with company ability to render fair, objective and unbiased services.
6. Endeavor to reduce opportunities for conflict through prescriptive measures such as through information barriers to block or hinder the flow of information from one department/ unit to another, etc.
7. To place appropriate restrictions on transactions in securities while handling a mandate of issuer or client in respect of such security so as to avoid any conflict.
8. Not deal in securities while in possession of material non published information.
9. Not to communicate the material non published information while dealing in securities on behalf of others.
10. Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities.
11. Not have an incentive structure that encourages sale of products not suiting the risk profile of their clients.
12. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest.