

POLICY FOR MANAGING CONFLICT OF INTEREST

Background

In compliance of SEBI Circular CIR/MIRSD/5/2013 dated August 27, 2013

The company shall take measures to identify and avoid or to deal or manage actual or potential conflict of interest, develop an internal code of conduct governing operations and formulate standards of appropriate conduct in the performance of their activities, and ensure to communicate such policies, procedures and code to all concerned.

Policy

The company and its employees shall:

1. At all times maintain high standards of integrity in the conduct of their business
2. Ensure fair treatment of their clients and not discriminate amongst them
3. Ensure that their personal interest does not, at any time conflict with their duty to their clients and client's interest always takes primacy in their advice, investment decisions and transactions
4. Make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair their ability to render fair, objective and unbiased services
5. Endeavour 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.
6. 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;
7. Not deal in securities while in possession of material non published information
8. Not to communicate the material non published information while dealing in securities on behalf of others;
9. Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;
10. Not have an incentive structure that encourages sale of products not suiting the risk profile of their clients
11. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest

Review Policy

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs.

The policy may be reviewed by the Director/Compliance Officer and place the changes in policy before the Board at the meeting.

Approval Authority

This policy is as approved by the Board of Directors.

