

## **Policy to deal with conflict of Interest**

As per guideline laid down in IFSCA/SEBI circular no. CIR/MIRSD/5/2013 dated August 27, 2013 for dealing with Conflicts of interest; we shall adhere to these guidelines for avoiding or dealing with or manage the conflict of interest. In order to comply with said circular, the following measures are adopted:

- I. Maintain high standards of integrity in the conduct of our business at all the times.
- II. Make appropriate disclosure to the clients of possible source or potential areas on conflict of interest which would impair the ability to render fair, objective and unbiased services.
- III. Lay down policies and internal procedures to identify, avoid, deal, manage actual or potential conflict of interest and ensure to communicate such policies & procedure to all concerned.
- IV. Ensure fair treatment of our Clients and not discriminate amongst them.
- V. Ensure that our personal interest does not, at any time conflict with their duty to our Clients and Client's interest always takes primacy in their advice, investment decisions and transactions.
- VI. 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 to another etc.
- VII. Not deal in securities while in possession of material non published information.
- VIII. Not to communicate the material non-published information while dealing in securities on behalf of others.
- IX. Not in any way contribute to manipulate the demand or supply of securities in the market or to influence prices of securities.
- X. Not to have an incentive scheme or client referral structure that encourages sale of products not suiting the risk profile of their clients.
- XI. Not to share the information received from clients or pertaining to them, obtained as a result of our dealings, for our personal interest.
- XII. 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.

We shall also review all other policies and shall ensure wherever the conflict of interest is arising, the same shall be eliminated immediately.