



CONFLICT OF INTEREST

Doc No.: IM/SM/COI

Rev No./DT: 00/01.04.19

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The Directors and Key Management Persons shall:

- Lay down policies and internal procedures 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;
- Develop measures to prevent or limit any person from exercising inappropriate influence over the way in which the services are carried out;
- At all times maintain high standards of integrity in the conduct of its business;
- Ensure fair treatment of its clients and not discriminate amongst them;
- Ensure that its personal interest does not, at any time conflict with its duty on its clients and client's interest always takes primacy in its advice, investment decisions and transactions;
- Make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair its ability to render fair, objective and unbiased services;
- Appoint independent internal auditors to ensure that appropriate systems and controls are maintained and their effectiveness or otherwise is being reported to the Company's Directors.
- Not suiting the risk profile of its clients; not share information received from clients or pertaining to them, obtained as a result of their dealings, for its personal interest.

A handwritten signature in blue ink, appearing to read 'Prasad Kulkarni', is written over a circular stamp.

Prasad Kulkarni

CFO

Date: 01.04.2019