

# POLICY ON CONFLICTS OF INTEREST

## OVERVIEW

A conflict of Interest is defined as a situation arising in a business relationship Where the capacity of a person to make an independent decision or judgment May be influenced or prejudiced by considerations of a personal nature, or Considerations emanating from a third party, resulting in the interests of the Customer being inappropriately affected

The primacy of our customers' interests is one of the foundations of firm's code Of ethics. In order to uphold this principle, firm must operate in a manner that Prevents or manage any potential conflict of interest between firm & its customer That may entail a material risk of damage to a customer's interests

This conflicts of interest policy aims to prevent or manage any material conflicts Of interest likely to appear in firm's dealing with customers & is fully supported by Firm Management

## **PURPOSE OF THE CONFLICTS OF INTEREST POLICY**

The purpose of this policy is to:

- i. lay down, with active involvement of management, 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
  - ii. formulate standards of appropriate conduct in the performance of firm activities, and ensure to communicate such policies, procedures and code to all concerned;
- ii. At all times maintain high standards of integrity in the conduct of business;
- iii. Ensure fair treatment of clients and not discriminate amongst them;
- iv. Ensure that personal interest of anyone 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;
- v. 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;
- vi. 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;

- vii. 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;
- viii. Not deal in securities while in possession of material non published Information;
- ix. Not to communicate the material non published information while dealing in Securities on behalf of others;
- x. Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;
- xi. Not have an incentive structure that encourages sale of products not Suiting the risk profile of their clients;
- xii. Not share information received from clients or pertaining to them, Obtained as a result of their dealings, for their personal interest;

**To implement this policy effectively firm will**

1. Maintain honesty, high standard of integrity & fairness in all dealings With all clients at all times
2. Identify potential area of conflict which might lead to a material risk of damage to a customer's interest
3. Control & monitor all procedures aimed at governing the flow of confidential information

For S.A.DESHPANDE & CO  
Sd/-  
NILESH SHAH  
Compliance Officer  
Date: 09-09-2013