

### **Policy on Conflict of Interest**

M/s Sanchay Fincom Ltd. is registered as a Stock Broker with Bombay Stock Exchange Limited (BSE) for providing financial services in Indian Capital Markets to the individual, corporate, financial. Sanchay Fincom is also a SEBI Registered Depository Participant.

SEBI vide its Circular No. CIR/MIRSD/5/2013 dated 27.08.2013 has laid down the guidelines required registered intermediaries to establish and implement a conflict of interest policy. To adhere to the SEBI's guidelines, the company is required to take all reasonable steps to identify or manage conflicts of interest of its clients.

We are presently governed by the provisions for avoidance of conflict of interest as mandated in the respective regulations along with relevant circulars issued from time to time by SEBI. Our associated persons are educated for the compliance of these guidelines. Guidelines for dealing with Conflict of Interest are as follows:

- 1) We lay down with active involvement of senior 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 formulate standards of appropriate conduct in the performance of their activities, and ensure to communicate such policies, procedures and code to all concerned.
- 2) All time maintain high standard of integrity in conduct of our business.
- 3) Ensure fair treatment of clients and no discrimination between them.
- 4) Ensure that personal interest does not, at any time conflict with our duty, our clients and client's interest always takes primacy in our advice, investment, decisions and transactions.
- 5) Make appropriate disclosure to the clients of possible source or potential area of conflict of interest which would impair our ability to render fair, objective and unbiased services.
- 6) 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.
- 7) Place appropriate restrictions or 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 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 our clients.
- 12) Not shared information received from clients or pertaining to them, obtained as a result of Dealing, for their personal interest.

Our company shall put in place adequate systems for implementation of these circulars and provide necessary guidance enabling identification, elimination or management of conflict of interest situation. Our company shall review the compliance of this circular periodically.

We shall conduct assessment of our existing policies on conflict of interest in a time bound manner, not later than 6 months from the date of this circular and bring them in line with the requirements of these guidelines.