

POLICY ON CONFLICT OF INTEREST

1. Introduction

SEBI vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013 issued a General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market. SEBI decided to put in place comprehensive guidelines to collectively cover such entities and their associated persons, for elimination / avoidance of their conflict of interest and educating the Associated Persons as defined in Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007 for the compliance of the guidelines. SEBI advised to 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.

SEBI guidelines intends Intermediaries and their Associated Persons to comply with the following –

- high standards of integrity in the conduct of business;
- fair treatment of clients and no discrimination amongst them;
- avoidance of conflict of personal interest with the client and primacy of clients' interest;
- appropriate disclosure to the clients of possible source or potential areas of conflict of interest;
- reducing the opportunities for conflict through prescriptive measures;
- appropriate restrictions on transactions in securities while handling a mandate of issuer or client in respect of such security;
- not to deal in securities while in possession of material non published information;
- not to communicate the material non published information while dealing in securities on behalf of others
- not to manipulate the demand for or supply of or to influence prices of, securities.
- not to have an incentive structure that encourages sale of products not suiting the risk profile of the clients;
- not to share client information for the personal interest;

This document sets out the Policy on management of Conflict of Interest for Standard Securities & Investment Intermediates Ltd. (SSIIL), with intent to define a policy and procedure for dealing with Conflict of Interest and to effectively manage any conflicts of interest that may arise in carrying out its business. Senior Management is responsible for ensuring that the Company's systems, controls and procedures are adequate to identify and manage conflicts of interest.

Policies and procedures

The Company has developed and implemented policies and procedures throughout its business to prevent or manage potential conflicts of interest. Our employees receive guidance and training in these policies and procedures, and they are subject to monitoring and review processes.

Measures to avoid or to deal or manage actual or potential Conflict of Interests

When a conflict of interest arise, it needs to be managed promptly and fairly. The Company puts in place following arrangements to ensure that:

- i. There is a clear distinction between the different departments' operations;
- ii. No single person will gather conflicting information, thus counterfeiting or hiding information from investors is minimized;
- iii. The Company's employees are prohibited from investing in a financial instrument for which they have access to non-public or confidential information;
- iv. Transactions by the Company's employees are neither performed nor executed by themselves.
- v. Each department will control the flow of information where, otherwise, the risk of conflict of interest may harm the interest of a Client;
- vi. Relevant information is recorded promptly in a secure environment to enable identification and management of conflicts of interests;
- vii. Adequate records are maintained of the services and activities of the Company where a conflict of interest has been identified;
- viii. In certain jurisdictions appropriate disclosure may be made to the Client in a clear, fair and not misleading manner to enable the Client to make an informed decision;
- ix. There is a periodic review of the adequacy of the Company's systems and controls.
- x. Employees are required to avoid conflicts of interest with activities they undertake outside SSIL.

2. Internal code of conduct governing operations.

SSIL and Associated Persons shall abide by the Code of Conduct contained in the Schedule II of the Securities and Exchange Board of India (Stock-Brokers and Sub-Brokers) Regulations, 1992, as amended, for accomplishment of the objectives of the SEBI Code.

3. Communication of policies, procedures and code to all concerned.

This Policy on management of Conflict of Interest offers general guidance in addition to SSIL policies and procedures and is not meant to replace any of those policies or procedures and shall be made available through SSIL website www.standardsec.com or by sending a request in writing. SSIL expects all its Associated persons, employees, to adhere to this policy. The Board of Directors of Standard Securities & Investment Intermediates Ltd.. reserves the right to amend, supplement or discontinue this policy and the matters addressed herein, without prior notice, at any time.

4. Implementation and Review of policy of management on Conflict of Interest.

This policy shall come into effect from the date of approval of the Board of Directors of the company for its implementation so as to provide necessary guidance enabling identification, elimination or management of conflict of interest situations and that the same shall be reviewed and assessed annually by the company management.