

GENERAL GUIDELINES FOR DEALING WITH CONFLICTS OF INTEREST OF

INTERMEDIARIES

1. OBJECTIVE OF THE POLICY:

Dhan Stock & Share Brokers Pvt Ltd is committed to conducting its business in accordance with the applicable laws, rules and regulations. This policy is intended by Dhan Stock & Share Brokers Pvt Ltd in compliance with the SEBI circular no CIR/MIRSD/5/2013 dated August 27, 2013 in connection with General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognized Stock Exchanges, Recognized Clearing Corporations, Depositories and their Associated Persons in Securities Market.

This policy is intended to protect the interests of investors in securities and to promote the development of, and to regulate the securities market in exercise of powers conferred under Sections 11 of the Securities and Exchange Board of India Act, 1992.

2. MEANING OF ASSOCIATED PERSON:

Associated Person is being defined under Section 2 (c) of Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007 as a principal or employee of an intermediary or an agent or distributor or other natural person engaged in the securities business and includes an employee of a foreign institutional investor or a foreign venture capital investor working in India.

3. POLICIES AND PROCEDURES:

Each Director, Senior Manager, Officer and employee is expected to comply with this letter and spirit of this code. As per this our company and its Associated Persons shall;

1. Lay down, with active involvement of senior management, policies and internal procedures to identify and avoid or to deal or manage actual or



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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. At all times maintain high standards of integrity in the conduct of their business.
3. Ensure fair treatment of their clients and not discriminate amongst them.
4. Ensure that their personal interest 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.
5. 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.
6. 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.
7. 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.
8. Not deal in securities while in possession of material non-published information.
9. Not to communicate the material non-published information while dealing in securities on behalf of others.



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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 their clients.
12. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest.

2.6 EDUCATION TO ASSOCIATED PERSONS:

Our Company shall organize and conduct seminars, programmes time to time for educating its associated persons for compliance of general guidelines for dealing with conflict of interest of Intermediaries, Recognized stock exchanges, Recognized Clearing Corporations, Depositories and their associated person.

2.6 IMPLEMENTATION SYSTEM:

Our Board shall put in place systems for implementation of these guidelines and provide necessary guidance enabling identification, elimination or management of conflict of interest situations. And the Board shall review the compliance of this policy periodically.

2.6 ASSESMENT OF EXISTING POLICIES:

Our Company shall conduct assessment of the existing policies on conflict of interest not later than 6 months from the date of SEBI circular no CIR/MIRSD/5/2013 dated August 27, 2013 and after that in every six months and bring them in line with the requirement of these guidelines.

This policy can be modified/amended/alterd as required from time to time in compliance of the relevant provisions/regulations in this regard.

Note: The above policy is approved and adopted in the meeting of the Board

of Directors held on 9th May, 2014

DHAN STOCK & SHARE BROKERS PVT. LTD.

Sanjay Khatun
Compliance Officer