

SHUBHAM STOCK BROKING SERVICES PRIVATE LTD.

Policies and Internal Procedures / Internal Code of Conduct for the Company, its Sub-brokers and its Employees for Dealing with Conflicts of Interest in performance of their Activities

Ref.: NSE Circular Download No. 24301 dated 29.08.2013 read with SEBI Circular No. CIR/MIRSD/5/2013 dated 27.08.2013

The Company, its Sub-brokers and its Employees shall:

1. at all times maintain high standards of integrity in the conduct of their business;
2. ensure fair treatment of their clients and not discriminate amongst them;
3. 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;
4. 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;
5. 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.;
6. 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;
7. not deal in securities while in possession of material non published information;
8. not communicate the material non published information while dealing in securities on behalf of others;
9. not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;
10. not have an incentive structure that encourages sale of products not suiting the risk profile of clients;
11. not share information received from clients or pertaining to them, obtained as a result of their dealings, for personal interest;