

**POLICY ON CONFLICT OF  
INTEREST**

**SHUBHAM STOCK BROKING  
SERVICES PRIVATE LIMITED**

**(Member of NSE & DP of CDSL)**

## **Policy on Conflict of interest**

Policy will be applicable to all the branches, Employees and clients etc.

- All associated with us are required to ensure that there is no conflict of interest is arising during the course of operations and the firm has issued the guidelines from time to time for the showing possible area of conflict of interest.
- The internal code of conduct governing risk management policy, acceptance of new clients, due diligence etc. and other operational matters shall ensure that no conflict of interest arises.
- All concerned are expected to maintain highest standard of integrity and totally impartial in dealing with different matters.
- All concerned shall ensure that their personal interest is no way affecting in performance of their duties, In the process clients interest would be supreme and all will be required to ensure the same.
- All concerned shall appropriately disclose at all time that their personal interest and conflict of interest is not coming in the way of performing the duties.
- No clients shall deal in the restricted scrip or the scrip in which otherwise he/she is interested.
- No employee of **Shubham** shall deal in securities / Commodities where he/she is in possession of price sensitive information being an insider and shall not communicate non-published information in connection with the respective securities to anyone.
- No employee shall trade/ transact in a specific scrip or in any scrip to manipulate the demand and supply of the scrip and try to hamper free, fair and just price discovery process.
- Company shall ensure no incentive schemes are offered to encourage enhance volume not matching with risk profile of the clients which is not commensurate with the risk management policy of the organization.
- No employee is allowed to share the information obtained by them as a result of their dealing which is conflicting of personal interest. The company shall from time to time provide training to its employees and clients for identifying elimination of conflict of interest situation arising from time to time.
- Company shall also review all other policies and shall ensure wherever the conflict of interest is arising shall be eliminate immediately.
- The policy is reviewing on yearly basis as well as when changes required

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