

SUNFLOWER BROKING PRIVATE LIMITED

Policy on Managing Conflict of Interest

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

- All associated with us are required to ensure that there is no conflict of interest arising during the course of operations and the Company 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 concern 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.
- The rights to modify different software used by organization are restricted to the Managing Director.
- No Clients shall deal in the restricted scrip or the scrip in which otherwise he/she is interested.
- No Client shall deal in securities 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.
- No Client shall trade/transact in 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 that 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 dealer, no sub-broker, no authorized person or 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 employees, authorized persons, sub brokers and clients for identifying elimination of conflict of interest situation arising from time to time and Compliance Officer is required to report to the Board on above circular and Board is expected to review the same.
- Company shall also review all other policies and shall ensure wherever the conflict of interest is arising shall be eliminated immediately.