

Intellect Commodities Pvt Ltd

Conflict Of Interest

It is in accordance with the guideline circular No CIR/MIRSD/5/2013 of Securities Stock Exchange Board of India dated 27th August, 2013 for dealing with conflicts of interest of intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market.

The comprehensive Policy to collectively cover ICPL and the associated persons for elimination of their conflict of interest, as detailed hereunder.

ICPL shall adhere to these guidelines for avoiding or dealing with or managing conflict of interest. We shall be responsible for educating the associated persons for compliance of these guidelines.

For the purpose of this policy "intermediaries" and "associated persons" have the same meaning as defined in Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007.

ICPL and the associated persons,

- i. 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;
- ii. At all times maintain high standards of integrity in the conduct of our business;
- iii. Ensure fair treatment of their clients and not discriminate amongst them;
- iv. Ensure that their personal interest does not, at any time conflict with the duty to our clients and client's interest always takes primacy in our advice, investment decisions and transactions;
- v. Make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair our ability to render fair, objective and unbiased services;
- vi. 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.;
- vii. 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;

- viii. Not deal in securities while in possession of material non published information;
- ix. Not to communicate the material non published information while dealing in securities on behalf of others;
- x. Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;
- xi. Not have an incentive structure that encourages sale of products not suiting the risk profile of the clients;
- xii. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest;

The Boards of ICPL have put in place systems for implementation of this circular and provide necessary guidance enabling identification, elimination or management of conflict of interest situations. The Boards shall review the compliance of the circular periodically.

ICPL will conduct assessment of the existing policies on conflict of interest in a time bound manner, not later than 6 months from the date of this circular and bring them in line with the requirements of prescribed guidelines.

The said guidelines shall be in addition to the provisions, if any, contained in respective regulations/ circulars issued by the Board from time to time regarding dealing with conflict of interest.

The policy is to protect the interests of investors in securities and to promote the development of, and to regulate the securities market.