

### **Policy and procedure on conflicts of interest**

Policy regarding conflict of interest is created by the Compliance Officer and approved by the Board of Directors on 22-03-2024.

#### **BACKGROUND:**

SEBI vide circular CIR/MIRSD/5/2013 dated 27<sup>th</sup> of August , 2013 has come out with the general guidelines on the conflict of interest for intermediaries, depositories and their associated person in securities market.

#### **OBJECTIVES:**

The objective of the policy is to ensure that personal interest of the entity does not, at any time conflict with it's duty towards clients and client's interest shall always take primacy in it's advice, investment decisions , transactions and to make necessary disclosure where the personal and professional interest of the clients and the associated person are potentially at odd.

#### **FUNDAMENTAL PRINCIPLE:**

No persons concerned with the organization shall derive any personal profit or gain directly or indirectly by reason of his/ her participation in the personal interest so that moral soundness and integrity in the conduct of business can be maintained.

The entity shall treat it's clients equally and shall avoid discrimination between them.

In case any interest arises proper disclosure shall be made to keep the client updated.

Complete information shall be provided to the associated persons and the clients to stop dealing in securities while in possession of material non published information.

To share information where ever required or deemed fit with related entities on information received from clients or associating to them, obtained as a result of dealings for their personal interest.

#### **PRECAUTIONS:**

To reduce opportunities for conflict through customary measures to avoid the proper flow of information from one Department to another.

To place appropriate restrictions on transactions in securities while handling a mandate of issuer or client in respect of such security so as to avoid such conflicts so arising.

Not to entertain transmission of unpublished information while dealing in securities on behalf of the clients.

Keep a watch on such activities which could contribute to manipulate the demand and supply of securities in market or to influence the price of securities.

Avoid creating any such incentive structure to encourage the sale of products which does not suit the risk profile of the clients.

**IMPLEMENTATION:**The Board hereby directs the managerial personnel who are involved in day to day activities to implement the above policy.

The Compliance Officer is advised to educate the employees to bring an effective implementation of the policy.

**Approval Authority and Review policy:**

This policy is approved by the Board of Vardhaman Capital Pvt. Ltd.

This policy may be reviewed as and when there are any changes introduced by any statutory authority or as and when it is found necessary to change the policy due to business needs and will place the changes in policy before the Board.

**Policy communication:**

A copy of this policy shall be made available to all the relevant staff/persons such as: compliance officer / department in-charge /authorized persons. Further, a copy of this policy has to be displayed on our website [www.vardhamancapital.co.in](http://www.vardhamancapital.co.in)