

## **POLICY FOR CONFLICT OF INTEREST**

*(Ref: SEBI Circular CIR/MIRSD/5/2013 dated August 27, 2013)*

### **INTRODUCTION**

We, Zanskar Securities Private Limited Corporate Trading Member of NSE, BSE, MCX & MSEI registered with SEBI. We have been involved in Stock Broking Services.

As a Stock Broking Outfit, we were so far governed by the provisions for avoidance of conflict of interest as mandated in the respective regulations read with relevant circulars issued from time to time by SEBI.

On the lines of Principle 8 of the International Organization of Securities Commissions (IOSCO) Objectives and Principles of Securities Regulations, SEBI had issued circular No. CIR/MIRSD/5/2013 dated August 27, 2013, providing general guidelines on Conflicts of Interest of Intermediaries, Recognized Stock Exchanges, Recognized Clearing Corporations, Depositories and their Associated Persons in Securities Market.

In compliance with the same this document lists down our principal policies for "Conflict of Interest".

### **Aim and Approach:**

This Conflicts of Interest Policy is designed to identify actual or potential conflicts of interest that may arise between:

- Zanskar Securities Pvt. Ltd. and its clients or potential clients,
- Different clients or groups of clients of the organization,
- Zanskar Securities Pvt. Ltd. staff members and clients, or
- Two departments of the Office

and to detail the procedures we have put in place to manage such conflicts.

In the event that we are unable to satisfy ourselves that our procedures and measures for managing conflict or potential conflict will prevent the risk of damage to your interests, we will disclose to you the nature of the potential conflict in order to give you an opportunity to consider whether or not to accept our services.

### **Possible Conflicts of Interest:**

Given the type of business activities carried out by us it is unavoidable that a number of actual or potential conflicts of interests may exist during the course of our relationship with you. In agreeing to enter into all KYC Documentation and beginning business activities with us you acknowledge and agree that Zanskar Securities Pvt. Ltd. or some other party connected with us (including other clients) may have an interest, relationship or arrangement in relation to a transaction or service that conflicts with a duty owed to you.

## **Managing Conflicts of Interest**

We control conflicts of interest through a range of administrative and organizational processes to maintain logical & physical segregation by business area, preserve the highest level of confidentiality, restrict information flows and ensure independence in our activities which are designed to safeguard the interests of our clients.

The measures and procedures to manage possible conflicts of interest include:

- In the circumstances where we execute client orders with Zanskar Securities Private Limited as principal we will ensure that you received the best possible result.
- The restriction of the flow of information (Chinese Walls) solely to employees requiring access to that information for the purposes of their duties and an enforced policy for information management to ensure no information is handled inappropriately.
- Aggregation and allocation of orders is undertaken in FIFO basis to ensure that no client is unfairly disadvantaged.
- The application of rigorous personal account dealing rules to all members of Group staff and connected persons.
- All staff are required to act independently in the best of interests of clients. Zanskar Securities Private Limited undertakes ongoing training in relation to our internal procedures and code of conduct and the requirement to act in the best interest of our clients.
- we restrict the giving and receiving of gifts, entertainment or minor hospitality to ensure that no conflict of interest might arise on the basis on an inducement.
- We do not deal in securities while in possession of material non published information nor do we communicate the material non-published information while dealing with securities on behalf of clients.
- We do not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities.
- We do not have an incentive structure that encourages sale of products not suiting the risk profile of their clients.
- We do not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest.

We review this “Conflict of Interests” policy at least annually and, where appropriate, on an ad hoc basis to ensure it adequately reflects the types of conflicts or potential conflicts that might arise. Should you like to discuss any aspects of our policy please do not hesitate to contact the Compliance officer of Zanskar Securities Private Limited directly.