

ISHANIKA SECURITIES PVT. LTD.



Member : National Stock Exchange of India Ltd.
SEBI Registration No. CM : INB 231049330 / F&O : INF 231049330

ISHANIKA SECURITIES PVT. LTD.

**Internal Policy for dealing with
Conflicts of Interest of
Intermediaries.**

**With effect from: September 01,
2013**

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In view of SEBI Circular no. CIR/MIRSD/5/2013 Dated August 27, 2013 M/s. ISHANIKA SECURITIES PVT. LTD. & its all employees, Dealers, Approved Persons & related entities shall strictly adhere to the followings:

1. At all times maintain high standards of integrity in the conduct of their business;
2. Ensure fair treatment of the clients and not discriminate amongst them;
3. Ensure that their personal interest does not, at any time conflict with their duty to their client and client's interest always takes primacy in their advice, investment decisions and transactions;
4. Make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair their ability to render fair, objective and unbiased services;
5. 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.;
6. 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;
7. Not deal in securities while in possession of material non published information;
8. Not to communicate the material non published information while dealing in securities on behalf of others;
9. Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;
10. Not have an incentive structure that encourages sale of product not suiting the risk profile of their clients;
11. Not share information received from client or pertaining to them, obtained as a result of their dealings, for their personal interest;

ISHANIKA SECURITIES PVT. LTD.

Hari Prasad Khetan

Director