

Management of Conflict of Interests

(Ref: Approved in the Board meeting held on __.09.2013)

Coverage:-

SEBI vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013 issued a General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market. SEBI decided to put in place comprehensive guidelines to collectively cover such entities and their associated persons, for elimination / avoidance of their conflict of interest and educating the Associated Persons as defined in Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007 for the compliance of the guidelines.

We, Amrapali Capital and Finance Services Limited (herein after known as ACFSL) insist on the full transparency amongst the management, employees / Associated Persons, Sub-brokers, Authorised persons and all our clients, so as to include the following:

- i. Identify and avoid or to deal or manage actual or potential conflict of interest.
- ii. Maintain high standards of integrity at all times in the conduct of our business.
- iii. Ensure fair treatment of our clients without discriminating.
- iv. Ensure that our personal interest does not, at any time conflict with our duty towards our clients and client's interest always takes primacy in our advice, investment decisions and transactions.
- v. 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.
- 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. No 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 their clients.
- xii. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest.

This policy shall come into effect from the date of approval of the Board of Directors of the company for its implementation so as to provide necessary guidance enabling identification, elimination or management of conflict of interest situations and that the same shall be reviewed and assessed half-yearly by the company management.