

# CONFLICT OF INTEREST POLICY

## Introduction

Atlas Integrated Finance Ltd. was incorporated by Mr. Nilesh B.Shah and Mrs. Sucheta Shah in 1997 to provide Services in Capital Market.

The company is Member of The National Stock Exchange of India Ltd (NSE), The Bombay Stock Exchange Ltd (BSE) and also registered as a Depository Participant (DP) with Central Depository Services Limited (CDSL). We have started doing business from 3<sup>rd</sup> November, 1994 in NSE Capital Market segment & 16<sup>th</sup> July, 2010 in BSE Capital Market segment.

The company has a wide base of Corporate, HNI and Retail clients to further its growth and volume.

1.1. This policy emanates from the circular dated 27th August, 2013, issued by the Securities and Exchange Board of India (“SEBI”), through which SEBI has laid down the guidelines requiring registered intermediaries to establish and implement a conflicts of interest policy (hereinafter the “Policy”).

1.2. To adhere to the above guidelines, the Company is required to take all reasonable steps to identify, eliminate or manage conflicts of interest. The Company is committed to act honestly, fairly and professionally and in the best interests of its clients.

1.3. This Policy is not intended to, or does not create third party rights or duties nor does it form part of any contract between the Company and any client.

## 2. Scope

2.1 The Policy applies to the Board of Directors and Employees of the Company (collectively referred to as “Employees”) and relevant associated persons as defined in SEBI (Certification of associated persons in the securities market) Regulations, 2007 with respect to all interactions with the clients.

## 3. Purpose

3.1. The purpose of this Policy is to set out the Company’s approach to identify and manage conflicts of interest which may arise during the course of its business activities.

3.2. This Policy aims at:

- a. identifying circumstances which may give rise to conflicts of interest entailing a material risk of damage to clients’ interests,
- b. establishing appropriate procedures and systems to manage those conflicts, and
- c. ensuring the maintenance of such procedures and systems in an effort to prevent actual damage to clients’ interests through conflicts identified.

#### 4. Policy

4.1. The Directors and Key Management Person shall:

- a. lay down policies and internal procedures to identify and avoid or to deal or manage actual or potential conflict of interest;
- b. 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;
- c. develop measures to prevent or limit any person from exercising inappropriate influence over the way in which the services are carried out;
- d. at all times maintain high standards of integrity in the conduct of its business;
- e. ensure fair treatment of its clients and not discriminate amongst them;
- f. ensure that its personal interest does not, at any time conflict with its duty on its clients and client's interest always takes primacy in its advice, investment decisions and transactions;
- g. make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair its ability to render fair, objective and unbiased services;
- h. appoint independent Internal auditors to ensure that appropriate systems and controls are maintained and their effectiveness or otherwise is being reported to the Company's Board of Directors.
- i. not deal in securities while in possession of material non published information in accordance with the CDSL-Code of Conduct for Prevention of insider trading ("**Insider Trading Policy**");
- j. not to communicate the material non published information while dealing in securities on behalf of others in accordance with the Insider Trading Policy;
- k. not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;
- l. not have an incentive structure that encourages sale of products not suiting the risk profile of its clients;
- m. not share information received from clients or pertaining to them, obtained as a result of their dealings, for its personal interest.

#### 5. Compliance with the Conflict of Interest Policy

5.1. The Directors and Key Management Personnel of the Company shall confirm the compliance with the policy at all times.