

Policies and Internal Procedures to Identify and Avoid or to Deal or Manage Actual or Potential Conflict of Interest

Securities & Exchange Board of India (SEBI) vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013 laid down general guidelines for dealing with conflict of interest of intermediaries, recognized stock exchanges, recognized Clearing Corporation, depositories and their associated person in securities market.

As per the above, **Sadravya Money Management Private Limited (the “Company”)** is considered as intermediaries, as it is a trading member of NSE & BSE.

As per the said circular, the policy is as mentioned below:

1. The Company at all times maintains high standards of integrity in the conduct of its business.
2. The Company shall ensure to give fair treatment of its clients and not discriminate amongst them.
3. The Company shall ensure that its personal interest as well as any person dealing for or on behalf of The Company does not, at any time conflict with its duty towards their clients 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, i.e. while dealing with the clients of the company its employees or its Sub-Broker / Authorised Person shall not communicate to the clients about unpublished information about the companies.

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 products not suiting the risk profile of their clients.
11. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest.

The above policy shall be review and revised at the regular interval of time not later than 1 Year.

