

# BULL BROTHERS

## CONFLICT OF INTEREST

We are presently governed by the provisions for avoidance of conflict of interest as mandated in the respective regulations along with relevant circulars issued from time to time by SEBI. Our associated persons are educated for the compliance of these guidelines. Guidelines for dealing with Conflict of Interest are as follows:

- 1.) Ensure fair treatment of clients and no discrimination between them
- 2.) all time maintain high standard of integrity in conduct of our business,
- 3.) We lay down with active involvement of senior management, policies and internal procedures to identify and avoid or to deal or manage actual or potential conflict of interest 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.
- 4.) Ensure that personal interest does not, at any time conflict with our duty, our clients and client's interest always takes primacy in our advice, investment, decisions and transactions,
- 5.) Not have an incentive structure that encourages sale of products not suiting the risk profile of our clients
- 6.) Endeavour 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,
- 7.) Place appropriate restrictions or transactions in securities while handling a mandate of issuer or client in respect of such security so as to avoid any conflict,
- 8.) Clients Personal Information Or Information Received from Clients are not shared or disclosed In our community while dealing in securities ,for their personal interest,
- 9.) Not communicate the material non published information while dealing in securities on behalf of others,

10.)Not in any way contribute to manipulates the demand for or supply of securities in the market or to influence prices of securities,

11) Make appropriate disclosure to the clients of possible source or potential area of conflict of interest which would impair our ability to render fair, objective and unbiased services,

12)We have put in place adequate systems for implementation of these circulars and provide necessary guidance enabling identification, elimination or management of conflict of interest situation. Our Management review the compliance of this circular periodically.

Thanking You,

For: BULL BROTHERS

Compliance Officer