

POLICY ON CONFLICT OF INTEREST

SKI CAPITAL SERVICES LIMITED

Member: NSE, BSE, MCX, NSDL, CDSL

❖ REQUIREMENT:

SKI CAPITAL SERVICES LIMITED and all other companies in the SKI group must take all reasonable steps to identify conflicts of interest between itself, its managers and employees or any person directly or indirectly linked to them by control ("relevant person"), and a client or between one client and another.

❖ IDENTIFICATION OF CONFLICTS OF INTEREST:

In identifying conflicts that may arise and whose existence may entail a material risk of damage to the interests of a client, SKI CAPITAL SERVICES LIMITED must take into account whether it or a relevant person:

1. is likely to make a financial gain, or avoid a financial loss, at the expense of the client;
2. has an interest in the outcome of the service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome;
3. has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
4. carries on the same business as the client; or
5. receives or will receive from a person other than the client an inducement in relation to the service provided to the client other than the standard commission or fee for that service.

❖ CONFLICT AVOIDANCE:

Where a conflict is identified, we will seek to organise our business activities in a manner which avoids such a conflict. This may include considering the appropriateness of external relationships, nature of transactions, the interests involved etc.

❖ **MANAGEMENT OF CONFLICT:**

Where conflicts are unavoidable, we seek to identify them in advance and provide for their mitigation and management. These management arrangements will be designed to ensure the firm or its members, managers or employees are not advantaged where there is a material risk that a client is disadvantaged.

❖ **DISCLOSURE OF CONFLICT OF INTEREST:**

In the event that a conflict of interest arises where the implemented policies and procedures are not sufficient to ensure, with reasonable confidence, that risks of damage to the interests of a client will be prevented, SKI CAPITAL SERVICES LIMITED must clearly disclose the general nature and sources of the conflict to the client before undertaking business for the client. Such disclosure must be made in a durable medium and include sufficient detail to enable the client to make an informed decision with respect to the service in the context of which the conflict of interest arises. The form of any such disclosure must be approved by Compliance. Under SKI CAPITAL SERVICES LIMITED's policy over-reliance on disclosure without adequate consideration as to how conflicts may be managed appropriately is not permitted.

❖ **CHINESE WALL:**

SKI CAPITAL SERVICES LIMITED is appropriately segregated from other businesses within SKI Group. SKI CAPITAL SERVICES LIMITED utilises ring fenced IT systems for the conduct of its business. Decisions taken within SKI CAPITAL SERVICES LIMITED must be taken in the interests of its clients only even if such decisions may be detrimental to, or conflict with, the interests of a client of some other business area or a proprietary interest of SKI GROUP. Staff working for SKI CAPITAL SERVICES LIMITED must remain independent and neutral in the performance of their duties and responsibilities.

❖ **PRIMACY OF CLIENTS INTEREST:**

All employees are bound by the Code of Conduct of SKI Group, which imposes obligations to work in clients' best interests by:

providing clients with the most suitable products and services, with regard to their aims, resources, knowledge and experience;

giving clients clear, honest and non-misleading information and, if so requested, an opinion, in particular relating to expected performance, associated risks and pricing;

provide quality service that preserves the client's best interests;

treating clients fairly, without giving any client (or other counterparty) undue preferential treatment;

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behave transparently, notably by making available, at the client's request, any information relating to the execution of its transactions.

Senior Management of SKI Group has embedded a culture throughout the Business Line where clients' interests must be given priority such that no client will be put to a disadvantage.

❖ **EMPLOYEE AWARENESS:**

All Personnel receive a copy of the firm's Conflicts Policy and Conflicts Inventory. In addition, all Personnel are required to the Compliance Officer non-adherence to the firm's compliance procedures, including personal account dealing and receipt of gifts and inducements.

All Personnel receive both formal and informal training in respect of conflicts of interest generally, and on specific or potential conflicts to the firm.

All Personnel have to sign the Code of Conduct of SKI and Half yearly review.

❖ **HANDLING OF CONFIDENTIAL INFORMATION:**

SKI CAPITAL SERVICES LIMITED has adopted the following general principles in handling confidential, including price sensitive information:

SKI CAPITAL SERVICES LIMITED will only provide confidential information to external parties to the extent that it is obliged to do so by law, regulation and/or if foreseen in the provision of services requested.

Client information will always be treated in accordance with the appropriate level of confidentiality.

Client information will only be shared internally on a "need to know" basis unless other arrangements have been agreed upon with a client.

Confidential and price sensitive information will be subject to Chinese Walls procedures and will not be passed between SKI CAPITAL SERVICES LIMITED's different business areas.

Details of key personnel:

**Mr. Narinder Wadhwa,
Mr. Manick Wadhwa,
Mrs. Anu Malik,**