

WEALTHSTREET ADVISORS PRIVATE LIMITED

POLICY ON CONFLICT OF INTEREST

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. SEBI advised to 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.

Purpose:

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.

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.

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.

Policy for dealing with Conflict of Interest are as follows:

1. Wealthstreet Advisors Private Limited (WSAPL) at all times shall maintain high standard of integrity in conduct of business.
2. WSAPL shall ensure fair treatment to all its clients and no discrimination between them.

3. WSAPL shall ensure that in any dealing by any person for and on behalf of WSAPL with any of its client, there shall not be conflict with his duty to its client and client interest shall always be primary things in case of investment advice and transactions entered into with the company. This means that WSAPL as well as any person while dealing on behalf of WSAPL with the client shall not have vested interest in monetary or non monetary terms.
4. WSAPL shall make appropriate disclosure to the clients to ensure that fair and unbiased services are rendered to the clients.
5. WSAPL shall ensure that in case any person acting for and on behalf of WSAPL is having any conflict of interest, he/she shall inform the compliance Department.
6. WSAPL shall not deal in securities while in possession of material non published information.
7. WSAPL shall not communicate to the clients about unpublished information about the companies.
8. WSAPL shall not in any way carry out any activity that leads to manipulation of demand and supply of securities in the market and which in turn influence prices of securities.
9. WSAPL shall not have an incentive structure that encourages sale of products not suiting the risk profile of clients.
10. WSAPL shall not share any confidential information that it may have about a scrip received from a client for personal interest of the client.

Implementation

Board of Directors have set a system to implement the set of standards mentioned above and further, have put in place adequate systems for necessary guidance enabling identification, elimination or management of conflict of interest situation.

The Board will review the compliance of this circular periodically.

Review Of Policy

The policy will reviewed and amended whenever any new circular is issued by regulators or any direction given by them or as and when considered necessary by the Board.

Ajay Saraogi

Director

Compliance Department

