

Majortrend Capital Private Limited

(MCPL)

Policy on Conflict of Interest

Policy & Procedure 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 exchange, recognized Clearing Corporation, depositories and their associated person in securities market.

As per the above, **Majortrend Capital Private Limited** is considered as intermediaries, as it is a trading member of three national level recognized stock exchanges i.e. .NSE, BSE & MCX-SX.

As per the said circular, Majortrend Capital Private Limited as an entity classified as intermediaries shall laid down policy and procedure to identify and to avoid or to deal with conflict of interest. Accordingly this policy is being prepared.

The policy is as mentioned below:

- Majortrend Capital Private Limited (MCPL) at all times shall maintain high standard of integrity in the conduct of its business. This means MCPL shall have high standards of honesty and trustfulness while dealing in the business of securities market
- MCPL shall ensure to gives fair treatment to all its clients and it's not discriminating amongst clients .This means that MCPL shall give equal amount of good services to all its clients.
- MCPL shall ensure that any person dealing for and on behalf of MCPL 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 MCPL as well as any person while dealing on behalf of MCPL with the client shall not have vested interest in monetary or non-monetary terms.
- MCPL or any person acting for and behalf of MCPL while dealing with the clients with regards to securities business of the company shall ensure that if at all there is bound to be conflict of interest , the

proper disclosure shall be made to the client to ensure that fair and unbiased services are rendered to the clients . The copy of such disclosure shall be given to the compliance department.

- MCPL shall ensure that any person acting for and on behalf of MCPL is having any conflict of interest he/she shall informed to compliance department.
- MCPL along with any person acting for and on behalf of MCPL shall ensure that they shall not deal in any scrip if they are having information about the scrip or the company which is not being published.
- While dealing with the clients MCPL, its employee or its sub broker / Authorized person shall not communicate to the clients about unpublished information about the companies.
- MCPL and its trading members i.e. sub broker shall not contribute which lead to manipulation of demand and supply of the securities and which influence price of securities.
- MCPL and its sub brokers shall not have incentive structure for the clients to sale its products which is not suitable to risk profile of the clients.
- MCPL, its sub broker and employees shall not share the information about the scrip received from the clients, while dealing for their personal interest The above policy can be revised at the regular interval of time

Director

Kushal M Dalal