

**SAPPHIRE WEALTH MANAGEMENT
SERVICES PVT LTD.**

Internal Policy of Conflicts of Interest of Intermediaries.

With effect from: 01.09.2013

Regd. & Corporate Office:


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For Sapphire Wealth Management Services Pvt. Ltd.


Director.

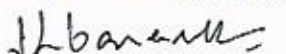
For Sapphire Wealth Management Services Pvt. Ltd.


Director.


In view of SEBI circular no. CIR/MIRSD/5/2013 Dated: 27.08.2013 M/S SAPPHIRE WEALTH MANAGEMENT SERVICES PVT LTD & it's all employee, Dealer, Approved Person, Sub-broker and related entities shall strictly adhere to the followings:

- i. At all times maintain high standards of integrity in the conduct of their business;*
- ii. Ensure fair treatment of their clients and not discriminate amongst them;*
- iii. Ensure that their personal interest does not, at any time conflict with their duty to their clients and client's interest always takes primacy in their advice, investment decisions and transactions;*
- iv. 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;*
- v. 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.;*
- vi. 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;*
- vii. Not deal in securities while in possession of material non published information;*
- viii. Not to communicate the material non published information while dealing in securities on behalf of others;*
- ix. Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;*
- x. Not have an incentive structure that encourages sale of products not suiting the risk profile of their clients;*
- xi. Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest;*

For Sapphire Wealth Management Services Pvt. Ltd.


Director.

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