

POLICY ON CONFLICT OF INTEREST

No dealer / employee of our organization is authorized to give any view or recommendation on any stock or sector or the market as a whole.

None of the terminals have any chatting software, or any internet sites which offer any such information on "trading tips". There is no technical analysis done or any such software on any terminal.

No back office staff have the authority to discuss any stock ideas / information or any market related news with any client. They too do not have access to any internet or any messenger services, chatting software.

Our director writes a monthly newsletter to the clients, which just expresses his views on the general market and no specific stock is discussed or views expressed.

All Dealers / Departments have been instructed not to send any mails received on market related news to any clients until approved by the Compliance Officer. Copies of all such Mails received and sent are saved in the Sent Boxes of the email designated for to each department / employee.

Strictly follow the code of conduct policy of the company.

Not to communicate any Price Sensitive Information to any non-applicable person. Not to use Price Sensitive Information to buy or sell securities of any sort, whether for their own account, their relative's account, Company's account or a client's account. (Relative to include self, spouse, dependant children and their spouses, dependant parents, dependant grand parents, dependant brothers, sisters and their spouses) Not pass on such information directly or indirectly by way of making a recommendation for the purchase or sale of securities.

For ELIXIR EQUITIES PVT. LTD DIRECTOR

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