



## **COMPOSITE SECURITIES LIMITED**

### **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, Composite Securities 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, Composite Securities 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:

- Composite Securities Limited (CSL) at all times shall maintain high standard of integrity in the conduct of its business. This means CSL shall have high standards of honesty and trustfulness while dealing in the business of securities market.
- CSL shall ensure to gives fair treatment to all its clients and it's not discriminating amongst clients .This means that CSL shall give equal amount of good services to all its clients.
- CSL shall ensure that any person dealing for and on behalf of CSL 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 CSL as well as any person while dealing on behalf of CSL with the client shall not have vested interest in monetary or non-monetary terms.
- CSL or any person acting for and behalf of CSL 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.
- CSL shall ensure that any person acting for and on behalf of CSL is having any conflict of interest he/she shall informed to compliance department.
- CSL along with any person acting for and on behalf of CSL 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 CSL, its employee or its sub broker / Authorized person shall not communicate to the clients about unpublished information about the companies.



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- CSL 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.
- CSL 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.
- CSL, 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