



**MADHUVAN SECURITIES PRIVATE LIMITED**  
**Member of National Stock Exchange of India Limited**  
**Member of National Securities Depository Limited**  
**CIN: U67120GJ1995PTC024502**  
**Regd. Office**  
82, Madhuvan, Opp. Hotel West End, Ellisbridge,  
Ahmedabad-380 006  
Tel : 079-68198992 Email : [info@madhuvan.com](mailto:info@madhuvan.com)

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### **CONFLICT OF INTEREST POLICY:**

M/sMadhuvan Securities Private Limited (MSPI) was incorporated on 03.02.1995 under The Companies Act, 1956. PresentlyMSPL is registered as a Stock Broker with National Stock Exchange of India Limited (NSE), for providing financial services in Indian Capital Markets to the individual, corporate, financial institutions etc. MSPL is also a SEBI Registered Depository Participant of National Depository Services Limited.

SEBI vide its Circular No. CIR/MIRSD/5/2013 dated 27.08.2013 has laid down the guidelines required registered intermediaries to establish and implement a conflict of interest policy. To adhere to the SEBI's guidelines, the company is required to take all reasonable steps to identify or manage conflicts of interest of its clients.

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. Guidelines for dealing with Conflict of Interest are as follows:

- 1.) We 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.
- 2.) all time maintain high standard of integrity in conduct of our business,
- 3.) Ensure fair treatment of clients and no discrimination between them,
- 4.) Ensure that personal interest does not, at any time conflict with our duty, our clients and client's interest always takes primacy in our advice, investment, decisions and transactions,



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- 4.) Make appropriate disclosure to the clients of possible source or potential area of conflict of interest which would impair our ability to render fair, objective and unbiased services,
- 5.) Endeavour 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,
- 6.) Place appropriate restrictions or transactions in securities while handling a mandate of issuer or client in respect of such security so as to avoid any conflict,
- 7.) Not deal in securities while in possession of material non published information,
- 8.) Not communicate the material non published information while dealing in securities on behalf of others,
- 9.) Not in any way contribute to manipulates the demand for or supply of securities in the market or to influence prices of securities,
- 10.) Not have an incentive structure that encourages sale of products not suiting the risk profile of our clients,
- 11.) Not shared information received from clients or pertaining to them, obtained as a result of dealing, for their personal interest,

### **CHINESE WALL POLICY**

Chinese Walls are formal arrangement that requires information held by a person in one Part of the business to be withheld from, or not to be used for, people in another part of the Business.

Employees who work in finance department are strictly prohibited from disclosing any non-public information about to any other member of staff or any third party, except under controls which require that, if non- public information is to be



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passed to an employee on the other side of the chiness wall, it must be authorized and recorded by the compliance officer.

They will only provide confidential information to external parties to the extent that it is obliged to do so by Law, regulation and/ or if foreseen in the provision of services requested.

Client information will only be shared internally on a “need to know basis “ unless other arrangement have agreed upon with clients.

All confidential and price sensitive information will be subject to Chinese walls procedures.

Our Board shall put in place adequate systems for implementation of these circulars and provide necessary guidance enabling identification, elimination or management of conflict of interest situation. Our Board shall review the compliance of this circular periodically.

We shall conduct assessment of our existing policies on conflict of interest in a time bound manner, not later than 6 months from the date of this circular and bring them in line with the requirements of these guidelines.

DATE : 09/04/2024

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