



NORTHEAST BROKING SERVICES LTD CONFLICT OF INTEREST POLICY

Placed and Approved in Board Meeting dated : 30-09-2021

SEBI Vide its circular number CIR/MIRSD/5/2013 dated 27-08-2013 has suggested guidelines for dealing with conflict of Interest of Intermediaries and Associated persons in securities market.

Company means NORTHEAST BROKING SERVICES LTD

The Company will train its employees to avoid or deal with or manage conflict of Interest if any arises in the normal course of business.

Company at all times maintain high standards of integrity in the conduct of its business.

Ensure fair treatment of their clients and not discriminate amongst them.

Ensure that its personal interest does not, at any time conflict with its clients and Client's Interest always taken always takes primacy in its advise, investment decisions and transactions.

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

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, etc.;

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

Not deal in securities while in possession of material non published information.

Not to communicate the material non published information while dealing in securities on behalf of others;

Not in any way contribute to manipulate the demand for or supply of securities in the market or to influence prices of securities;

Not have an incentive structure that encourages sale of products not suiting the risk profile of their clients;

Not share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest;

To achieve the objective, all the conversations with clients should be on recorded Lines. In case of any dispute or difference the same has to be referred immediately and clarified with clients immediately and brought to notice of Senior officials.

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