

**EQUIRUS WEALTH PRIVATE LIMITED**  
**CONFLICT OF INTEREST POLICY**

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## ***1. Introduction***

Securities and Exchange Board of India (SEBI) in its Circular No. CIR/MIRSD/5/2013 dated August 27, 2013 has prescribed the guidelines for dealing with Conflicts of Interest of Intermediaries requiring registered intermediaries to establish and implement a conflicts of interest policy. In compliance with the aforesaid circulars, Equirus Wealth Private Limited (hereinafter referred to as EWPL) adopts and implement below mentioned modified Policy on dealing with conflict of interest for clients which was reviewed and approved by its Board of Directors in their meeting held on July 24, 2023 and January 22, 2025 at the Registered Office of EWPL.

EWPL is a SEBI Registered Portfolio Manager: INP000007076, Stock Broker: INZ000309137, Depository Participant: IN-DP-741-2023, Research Analyst: INH000012342.

## ***2. Objective***

The purpose of this policy is to adopt and ensure implementation of best industry practices in synchronization with the guidelines prescribed by SEBI in connection with avoiding or managing conflict of interest which may arise during the course of our business. The contents of this policy shall be in addition to the provisions, if any, contained in respective regulations/ circulars issued by SEBI from time to time regarding dealing with conflict of interest and already covered in the policies put in force by EWPL.

## ***3. Scope***

This policy shall apply to the whole organization and all its employees.

## ***4. Potential conflicts of interest areas***

- a) EWPL or its employees is/are likely to make a financial gain, or avoid a financial loss, at the expense of the client.
- b) EWPL or its employees has/have an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in the outcome.
- c) EWPL or its employees has/have a financial or other incentive to favor the interest of another client or group of clients over the interest of one client.
- d) EWPL or its employees receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.
- e) Carries out the same business as the client.

## ***5. Procedure and controls for managing Conflict of Interests***

The procedures and controls that the Company follows to manage the identified conflicts of interests include the following:

- a) Effective procedures to prevent or control the exchange of information in the activities involving a risk of conflict of interest where the exchange of that information is likely to harm the interest of one or more clients;

- b) Chinese walls restricting flow of confidential and price sensitive information within the Company, physical separation of departments and sharing of information only on a “need to know basis”. The same shall be governed by ‘Code of Conduct for prevention of Insider Trading’ of EWPL.
- c) Personal account dealing requirements applicable to employees in relation to their own investments needs prior approval from the Compliance Team by submission of Form-D for pre-clearance of trades.
- d) The employees are governed by measures laid down in other policies which include the following:
- Restrictions on dealing in securities while handling client’s mandate or while in possession of material non-published information, or communicating such information while dealing on client’s behalf, manipulating demand or supply of securities or influencing their market price. The same shall be governed by ‘Code of Conduct for prevention of Insider Trading’ of EWPL.
  - Restriction on an incentive structure that encourages sale of products not suiting the client’s risk profile.
  - Restriction on divulgence of client’s confidentiality unless required by or under the law.
  - Employee shall at all time maintain high standards of integrity in the conduct of their business followed by compliance reporting to Board of Directors and senior management.
- e) It is expected that the employees shall:
- at all times maintain high standards of integrity in the conduct of their business.
  - ensure fair treatment of their clients and not discriminate amongst them.
  - ensure that personal interest does not, at any time conflict with their duty to the clients and client’s interest always takes primacy in the advice, 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.
  - 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.
  - 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 pertaining to the client while in possession of material non published information.
  - not to communicate the material non published information while dealing in securities pertaining to the client 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 share information received from clients or pertaining to them, obtained as a result of their dealings, for their personal interest.
- f) The Company’s Compliance team shall have oversight on the business to ensure that internal controls are appropriate.
- g) The Board of Directors of EWPL and the Compliance team share the responsibility for keeping the Policy in place. Any situation or transaction involving an actual or potential conflict of interest should promptly be reported to the Compliance team and obtain their determination as to whether a conflict exists.
- h) Where a material conflict arises and EWPL is aware of it, it will disclose the conflict to the client prior to undertaking the business for that client or, if EWPL does not believe that the disclosure is appropriate to manage the conflict, the Company may choose not to proceed with the transaction or matter giving rise to the conflict.

- i) Periodic review of the Policy will be done at the Board Meeting of EWPL. The same shall be done on need basis.

#### ***6. Violations and Consequences***

Any non- adherence with the Policy will be subject to strict action.

#### ***7. Disclosure***

The Company reserves the right to make review and / or amend its Policy and whenever it deems appropriate. In case you have any questions, please direct your query to our Compliance team at [employee\\_trading@equirus.com](mailto:employee_trading@equirus.com).