**POLICY FOR CONFLICT OF INTEREST**

Securities & Exchange Board of India (SEBI) vide its circulars 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, Pinnacle Forex & Securities Pvt. Ltd. (hereinafter referred to as “PFSPL”) is considered as intermediaries, as it is a trading member of two national level recognized stock exchanges i.e. NSE & BSE.

As per the said circular, Pinnacle Forex & Securities Pvt. Ltd. as an entity classified as intermediaries shall laid down policy & procedure to identify and to avoide or to deal with conflict of interest.

Accordingly this policy is being prepared.

The policy is as mentioned below:

1. PFSPL at all times shall maintain high standard of integrity in the conduct of its business. This means PFSPL shall have high standards of honesty and trustfulness while dealing in the business of securities market.
2. PFSPL shall ensure to gives fair treatment to all its clients and it’s not discriminating amongst clients. This means that PFSPL shall give equal amount of good services to all its clients.
3. PFSPL shall ensure that any person dealing for and on behalf of PFSPL 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 PFSPL as well as any person while dealing on behalf of PFSPL with the client shall not have vested interest in monetary or non monetary terms.
4. PFSPL or any person acting for and behalf of PFSPL 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.
5. PFSPL shall ensure that any person acting for and on behalf of PFSPL is having any conflict of interest he/she shall informed to compliance department.
6. PFSPL along with any person acting for and behalf of PFSPL 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.
7. While dealing with the clients PFSPL, its employee or its Sub Broker / Authorised person shall not communicate to the clients about unpublished information about the companies.
8. PFSPL and its trading members i.e. Sub Brokers / Authorised persons shall not contribute which lead to manipulation of demand and supply of the securities and which influence price of securities.
9. PFSPL and its trading members i.e. Sub Brokers / Authorised persons shall not have incentive structure for the clients to sale its products which is not suitable to risk profile of the clients.
10. PFSPL, its Sub Brokers / Authorised persons 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.

**FOR PINNACLE FOREX & SECURITIES PVT. LTD.**

**DIRECTOR**

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| Policy reviewed by: | Mr. Mehul Prakash Bhadra |
| Policy Approved by: | Mr. Arvind Vinchhivora |
| Approved by the Board on: | April 13, 2024 |
| Name of the entity: | Pinnacle Forex & Securities Pvt Ltd |