



# **MLB COMMODITIES PVT. LTD.**

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## **MLB Commodities Private Limited**

### **CONFLICTS OF INTEREST POLICY**

#### **1. Introduction**

SEBI vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013 issued a General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market. SEBI decided to put in place comprehensive guidelines to collectively cover such entities and their associated persons, for elimination / avoidance of their conflict of interest and educating the Associated Persons as defined in Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007 for the compliance of the guidelines. SEBI advised to 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;

SEBI guidelines intends Intermediaries and their Associated Persons to comply with the following –

- high standards of integrity in the conduct of business;
- fair treatment of clients and no discrimination amongst them;
- avoidance of conflict of personal interest with the client and primacy of clients' interest;
- appropriate disclosure to the clients of possible source or potential areas of conflict of interest;
- reducing the opportunities for conflict through prescriptive measures;
- appropriate restrictions on transactions in securities while handling a mandate of issuer or client; -
- not to deal in securities while in possession of material non published information;
- not to communicate the material non published information
- not to manipulate the demand for, or supply of, or to influence prices of, securities.

- not to have an incentive structure that encourages sale of products not suiting the risk profile of the clients;
- not to share client information for the personal interest;

## **2. Purpose**

The purpose of this Policy is to set out the Company's approach to identify and manage conflicts of interest which may arise during the course of its business activities.

This Policy aims at:

- a. identifying circumstances which may give rise to conflicts of interest entailing a material risk of damage to clients' interests,
- b. establishing appropriate procedures and systems to manage those conflicts, and
- c. ensuring the maintenance of such procedures and systems in an effort to prevent actual damage to clients' interests through conflicts identified.

## **3. Scope**

The Policy applies to the Board of Directors and Employees of the Company (collectively referred to as "Employees") and relevant associated persons as defined in SEBI (Certification of associated persons in the securities market) Regulations, 2007 with respect to all interactions with the clients.

## **4. Procedures and controls to managing Conflicts of Interests**

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

1. 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;
2. Measures to prevent or limit any person from exercising inappropriate influence over the way in which capital market services are carried out;

3. 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".
4. A policy designed to limit the conflicts of interests arising from the giving and receiving of inducement.
5. Personal account dealing requirements applicable to employees in relation to their own investments needs an approval from the Compliance Team.
6. Disclosure of Proprietary Trading undertaken by the company to all the clients.
7. Provisions governing access and circulation of data/ information as per 'Guidelines for Circulation of Unauthenticated News' of the Company.
8. The employees are governed by measures laid down in the internal code of conduct and other policies which include the following:
  - a. 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..
  - b. Restrictions on an incentive structure that encourages sale of products not suiting the client's risk profile.
  - c. Restrictions on divulgence of client's confidentiality unless required by or under the law.
  - d. The associated persons shall at all times maintain high standards of integrity in the conduct of their business followed by compliance reporting to Board of Directors and senior management.
9. The Company's Compliance team has oversight on the business to ensure that internal controls are appropriate.
10. The Board of Directors of the Company 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.

11. Where a conflict arises and the Company is aware of it, it will disclose the conflict to the client prior to undertaking the business for that client or, if the Company 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.

#### **6. Communication of policies, procedures and code to all concerned**

This Policy on management of Conflict of Interest offers general guidance in addition to other policies and procedures and is not meant to replace any of those policies or procedures and shall be made available through website [www.moneysukh.com](http://www.moneysukh.com). or by sending a request in writing. Company expects all its Associated persons, employees, to adhere to this policy. The Board of Directors of company reserves the right to amend, supplement or discontinue this policy and the matters addressed herein, without prior notice, at any time.

#### **7. Implementation and Review of policy of management on Conflict of Interest**

This policy shall come into effect from the date of approval of the Board of Directors of the company for its implementation so as to provide necessary guidance enabling identification, elimination or management of conflict of interest situations and that the same shall be reviewed and assessed by the company management from time to time.

#### **8. Violation and Consequences**

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