

Policies and Arrangements to manage Conflict of Interest

Identification of Conflicts of Interests :

I, Sreenivasa Sarma Bhagavathula, shall take adequate steps to identify conflicts of interest. In identifying conflicts of interest, I will take into account situations where myself or an employee or a Relevant Person:

- Is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;
- Has 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 that outcome;
- Has a financial or other incentive to favor the interest of one Client over another;
- Carries out the same business as the Client; or
- Receives from a person other than a Client an inducement in relation to a service provided to a Client, in the form of monies, goods or services, other than the standard commission or fee for that service.

Measures to avoid or to deal or manage actual or potential Conflict of Interests

Should a conflict of interest arise, it needs to be managed promptly and fairly. I, Sreenivasa Sarma Bhagavathula, put in place following arrangements to ensure that:

- No single person will gather conflicting information, thus counterfeiting or hiding information from investors is minimized;
- I/We will NOT invest in a financial instrument for which they have access to non-public or confidential information;
- Transactions by me or my employees are neither performed nor executed by themselves.
- In certain jurisdictions appropriate disclosure may be made to the Client in a clear, fair and not misleading manner to enable the Client to make an informed decision;

I/We have developed and implemented policies and procedures throughout the business to prevent or manage potential conflicts of interest.

- Every staff member, if any, must have a copy of the Policy on management of Conflicts of Interest.
- If a potential COI arises, the transaction must first be discussed with management before entering into the transaction.

- All new employees, if any, shall be required to declare their outside interests when they join the services.

Consequences of non-compliance with the policy

Non-compliance with this policy and the procedures described in it may be considered to be misconduct and may be subject to disciplinary action

Standards of appropriate conduct in the performance of the activities

The following standards of appropriate conduct in the performance of the activities.

- To place the client's interests first: Placing the client's interests first. To act honestly and not place personal gain or advantage before the client's interests.
- To provide business services with integrity: Integrity requires honesty and sincerity in all business matters.
- To provide business services objectively: Objectivity requires intellectual honesty and impartiality. Regardless of the services delivered.
- To be fair and reasonable in all business relationships & to disclose and manage conflicts of interest: Fairness requires providing clients what they are due, owed or should expect from a business relationship, and includes honesty and disclosure of material conflicts of interest. It involves managing one's own feelings, prejudices and desires to achieve a proper balance of interests. Fairness is treating others in the same manner that you would want to be treated.
- To protect the confidentiality of all client information: Confidentiality requires client information to be protected and maintained in such a manner that allows access only to those who are authorized. A relationship of trust and confidence with the client can only be built on the understanding that the client's information will not be disclosed inappropriately.
- To provide business services diligently: Diligence requires fulfilling business commitments in a timely and thorough manner, and taking due care in planning, supervising and delivering business services.