AAA INSTITUTIONAL SECURITIES PVT LTD

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POLICY FOR DEALING WITH CONFLICT OF INTEREST OF INTERMEDIARIES AND ASSOCIATED PERSONS IN SECURITIES MARKET

BACKGROUND

This Policy has been framed by AAA Institutional Securities Private Limited ("the Company") pursuant to SEBI Circular No. CIR/MIRSD/5/2013 dated August 27, 2013 on dealing with conflicts of interest of intermediaries, depositories and their associated persons in the securities market and other applicable provisions of the Securities and Exchange Board of India Act, 1992, rules, regulations, circulars and guidelines issued thereunder, as amended from time to time.

The objective of this Policy is to identify, prevent, manage and disclose actual or potential conflicts of interest that may arise during the course of the Company's securities market activities and to ensure that the interests of clients and investors remain paramount at all times.

DEFINITIONS

As per SEBI Circular No. CIR/MIRSD/5/2013 dated August 27, 2013, the terms **"Intermediary"** and **"Associated Person"** shall have the meanings assigned to them under the SEBI (Certification of Associated Persons in the Securities Markets) Regulations, 2007.

For the purpose of this Policy:

“Company” means **AAA Institutional Securities Private Limited**, a company incorporated under the provisions of the Companies Act, 2013 and registered with the Securities and Exchange Board of India ("SEBI") as a Stock Broker and/or such other intermediary as may be permitted under applicable laws.

"Intermediary" shall have the same meaning as assigned to it under the Securities and Exchange Board of India Act, 1992 and the regulations framed thereunder, and includes an entity registered under Sections 11 or 12 of the SEBI Act, 1992 or any person required to obtain membership or approval from a recognised stock exchange, clearing corporation, depository or any other SEBI-recognised self-regulatory organisation.

"Associated Person" shall have the same meaning as assigned under the SEBI (Certification of Associated Persons in the Securities Markets) Regulations, 2007 and includes a principal or employee of an intermediary, an Authorised Person, an agent, a distributor or any other natural person engaged in securities market activities on behalf of the Company.

"Conflict of Interest" means any actual, potential or perceived situation in which the personal, financial or other interests of the Company or any of its Directors, Employees or Associated Persons conflict, or appear to conflict, with the interests of clients, investors or the integrity of the securities market.

Accordingly, this Policy shall apply to all Directors, Employees, Authorised Persons, Agents, Distributors and other Associated Persons engaged in securities market activities on behalf of the Company.

OBJECTIVES

The objectives of this Policy are:

- To identify, avoid, manage and appropriately disclose actual, potential or perceived conflicts of interest in the securities market.
- To ensure fair, transparent and ethical conduct in all business activities.
- To safeguard the interests of clients and investors.
- To establish an internal code of conduct governing the operations of the Company.

- To comply with the applicable provisions of the SEBI Act, Rules, Regulations, Circulars and Guidelines issued from time to time.

GUIDING PRINCIPLES OF THE POLICY

All Directors, employees and Associated Persons with the Company covered under this Policy shall adhere to following principles and practices to avoid conflict of interest at all points:

- To maintain high standards of integrity in the conduct of business at all times.
- To ensure to communicate policies, procedures and code to all concerned.
- To ensure fair treatment of clients and not to discriminate amongst them;
- To ensure that Company's personal interest does not, at any time conflict with our duty towards our clients and clients' interest shall always takes primacy in our advice, investment decisions and transactions;
- To make appropriate disclosure to the clients of possible source or potential areas of conflict of interest which would impair our ability to render fair, objective and unbiased services;
- Endeavor to reduce opportunities for conflicts through prescriptive measures such as through information barriers to block or hinder the flow of information from one department/ unit to another, etc.;
- To 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 to 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 to contribute in manipulating the demand for or supply of securities in the market or to influence prices of securities;

- Not to provide incentive structure that encourages sale of products not suiting the risk profile of clients;

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

EFFECTIVE MECHANISM

The Company shall establish and maintain an effective mechanism for identifying, preventing, managing and monitoring conflicts of interest.

The Board of Directors shall ensure the effective implementation of this Policy and shall periodically review its adequacy and compliance with applicable regulatory requirements.

The Compliance Officer shall monitor compliance with this Policy, maintain appropriate records of disclosures, provide guidance on conflict management and report material matters to the Board of Directors.

This Policy shall be reviewed periodically and amended, wherever necessary, to ensure continued compliance with the applicable provisions of the SEBI Act, Rules, Regulations, Circulars and Guidelines.

POLICY APPROVAL

This Policy was approved by the Board of Directors of AAA Institutional Securities Private Limited at its meeting held on 24 July 2026 and shall come into effect from the date of approval.