



# **RIDHI SHARE BROKERS PRIVATE LIMITED**

Regd. Office: A-40 A, Bajaj Nagar, Opposite Gandhi Nagar Railway Station, Jaipur-302015 (Rajasthan)

Ph: +91-7300081118, Email: rsbpl72@yahoo.co.in, CIN: U67120RJ2007PTC025461

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## **Policy on Conflict of Interest**

### **1. Introduction**

Ridhi Share Brokers Private Limited ("RSBPL") recognizes that conflicts of interest are inherent in the financial services industry. These conflicts can arise from various sources, including relationships with clients, employees, and third-party service providers. This updated policy outlines RSBPL's commitment to proactively identify, manage, and mitigate potential and actual conflicts of interest, ensuring fair treatment of all clients and upholding the highest standards of ethical conduct, as required by regulations such as SEBI guidelines.

### **2. Objectives**

The primary objectives of this policy are to:

- Establish a framework for identifying, assessing, and mitigating potential and actual conflicts of interest.
- Ensure that client interests are prioritized in all business decisions and transactions.
- Promote transparency and accountability in all aspects of RSBPL's operations.
- Comply with all applicable SEBI rules, regulations, and guidelines related to conflict of interest.
- Maintain the integrity and reputation of RSBPL in the financial markets.
- Foster a culture of ethical conduct and compliance among all employees and stakeholders.

### **3. Scope and Applicability**

This policy applies to all Directors, officers, employees, authorized persons, temporary staff, and any other person associated with RSBPL, as well as their relatives, who may be in a position to influence RSBPL's operations, business decisions, or client interactions. It also applies to all products and services offered by RSBPL across all segments of the exchanges where it operates.



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### **4. Definition of Conflict of Interest**

A conflict of interest arises when the interests of RSBPL, its employees, or its affiliates diverge from the interests of its clients, or when there is a potential for personal gain at the expense of a client or RSBPL's reputation. This may include, but is not limited to:

- Proprietary Trading: Engaging in trading for RSBPL's own account that could adversely affect client orders or market prices.
- Personal Trading: Employees trading for their personal accounts in a way that conflicts with client interests or RSBPL's policies.
- Undue Influence: Employees or affiliates influencing clients to make investment decisions that benefit RSBPL or themselves.
- Cross-Selling: Incentivizing the sale of products or services that may not be suitable for the client.
- Relationships with Affiliates: Potential conflicts arising from relationships with affiliated entities that could compromise the best interests of clients.
- Gifts and Entertainment: Receiving gifts, hospitality, or entertainment that could create a real or perceived conflict of interest. according to nseindia.com
- Referral Fees: Conflicts arising from referral fees that could incentivize the recommendation of unsuitable products.

### **5. Identification and Assessment of Conflicts of Interest**

RSBPL has established procedures for identifying and assessing potential and actual conflicts of interest, including:

- Risk Assessment: Conducting a periodic risk assessment to identify potential conflicts of interest across different business areas.



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- Employee Declarations: Requiring employees to disclose any potential or actual conflicts of interest, including personal relationships, outside business interests, and financial holdings. according to [www.edelweissmf.com](http://www.edelweissmf.com)
- Conflict Register: Maintaining a register to record identified conflicts of interest, their assessment, and the mitigation measures taken.
- Whistleblower Policy: Providing a confidential channel for employees to report potential conflicts of interest or breaches of this policy.

### **6. Management and Mitigation of Conflicts of Interest**

RSBPL has implemented various measures to manage and mitigate identified conflicts of interest, including:

- Chinese Walls: Establishing physical and information barriers between different departments or business areas to prevent the flow of sensitive information.
- Information Barriers: Implementing policies and procedures to control the flow of confidential information within RSBPL.
- Personal Trading Policies: Establishing strict guidelines for personal trading by employees, including pre-clearance requirements and restrictions on trading in securities where RSBPL has material non-public information.
- Disclosure and Transparency: Disclosing potential conflicts of interest to clients, where appropriate.
- Independent Review: Seeking independent reviews or opinions on matters where a conflict of interest is identified.
- Recusal: Requiring employees to recuse themselves from decisions where they have a conflict of interest.
- Compensation Structures: Designing compensation structures to avoid incentives that could lead to conflicts of interest.



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- Enhanced Monitoring: Implementing enhanced monitoring and surveillance of trading activities to detect potential conflicts of interest.

### **7. Reporting of Conflicts of Interest**

Any actual or potential conflict of interest must be reported to the Compliance Officer immediately. The Compliance Officer will assess the conflict and take appropriate action to mitigate it.

### **8. Review and Updates**

This policy will be reviewed and updated at least annually, or more frequently as needed, to reflect changes in regulations, business practices, or market conditions.

Approved by the Board of Directors of RIDHI SHARE BROKERS PRIVATE LIMITED on [10 JANUARY 2025].