

Policy on Conflict of Interest

Coverage:

SEBI, vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013, issued General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories, and their Associated Persons in the Securities Market.

To ensure comprehensive compliance, SEBI has mandated guidelines for these entities and their associated persons, focusing on the elimination/avoidance of conflicts of interest and the education of Associated Persons as defined in the Securities and Exchange Board of India (Certification of Associated Persons in the Securities Markets) Regulations, 2007.

At SUNRISE GILTS & SECURITIES (P) LIMITED, we emphasize complete transparency among management, employees/Associated Persons, Authorised Persons, and clients, incorporating the following principles:

1. Identification and Management of Conflicts:

- a. Recognize and manage actual or potential conflicts of interest effectively.

2. Integrity and Professional Conduct:

- a. Uphold high standards of integrity in all business activities.

3. Fair Treatment:

- a. Ensure impartial treatment of all clients without discrimination.

4. Primacy of Client Interests:

a. Prioritize clients' interests over personal gains in all advice, investment decisions, and transactions.

5. Transparency:

a. Disclose potential sources or areas of conflict that could compromise our ability to offer unbiased services.

6. Information Barriers:

a. Mitigate conflicts through measures such as information barriers to limit the flow of sensitive data between units/departments.

7. Confidentiality:

a. Safeguard client information acquired through dealings and ensure it is not used for personal benefit.

Effective Date:

This policy shall come into effect on 1st April 2024, as approved by the Board of Directors of SUNRISE GILTS & SECURITIES (P) LIMITED. The management will review and assess the policy semi-annually to address new challenges and ensure its effectiveness.

Disclaimer:

SUNRISE GILTS & SECURITIES (P) LIMITED reserves the right to modify or amend any parameters outlined in this policy in accordance with prevailing market conditions and regulatory requirements. Updates to the policy will be published on the company's website as necessary.