

Conflicts of Interest Policy

Policy on identifying, eliminating and managing conflicts of interest, framed under SEBI circular no. CIR/MIRSD/5/2013 dated 27 August 2013.

Introduction

Vimal & Sons (hereinafter "the Firm") is registered as a Stock Broker with National Stock Exchange India Limited. SEBI, vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013 has laid down the guidelines requiring registered intermediaries to establish and implement a conflicts of interest policy (hereinafter the "Policy").

To adhere to the above guidelines, the Firm is required to take all reasonable steps to identify, eliminate or manage conflicts of interest. The Firm is committed to acting honestly, fairly and professionally and in the best interests of its clients.

This Policy is not intended to, or does not create third party rights or duties nor does it form part of any contract between the Firm and any client.

Purpose

The purpose of this Policy is to set out the Firm'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.

Scope

The Policy applies to the Partners and Employees of the Firm (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.

Potential Conflicts of Interest Areas

1. The Firm or employees or relevant associated person(s) is / are likely to make a financial gain, or avoid a financial loss, at the expense of the client.
2. The Firm or employees or relevant associated persons has / have 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 the outcome.
3. The Firm or employees or relevant associated person(s) has / have a financial or other incentive to favor the interest of another client or group of clients over the interest of one client.
4. The Firm or employees or relevant associated persons receives or will receive from a person other than the client an inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

Procedures and Controls to Managing Conflicts of Interests

The procedures and controls that the Firm 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. Appointment of Independent Internal auditors to ensure that appropriate systems and controls are maintained and their effectiveness or otherwise is being reported to the Firm's Partners.
4. Provisions governing access to electronic data as per the policy of 'Prevention of Circulation of Unauthenticated News'.
5. 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 the partners and compliance officer.
6. The Firm's Compliance officer has oversight on the business to ensure that internal controls are appropriate.
7. The Partners of the Firm and the Compliance officer 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 officer and obtain their determination as to whether a conflict exists.
8. Where a conflict arises and the Firm is aware of it, it will disclose the conflict to the client prior to undertaking the business for that client or, if the Firm does not believe that the disclosure is appropriate to manage the conflict, the Firm may choose not to proceed with the transaction or matter giving rise to the conflict.

Violation and Consequences

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

Disclosure

The Firm reserves the right to make review and / or amend its Policy and whenever it deems appropriate.

Signed: For Vimal & Sons — Partner

Compliance Officer: Neelakshi Kshemkalyani — neelakshik@vimalandsons.com

Last reviewed: April 2026.