**Adam Securities Limited**

**Conflict of Interest Policy**

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**Conflict of interest with Customers**

1. Adam Securities Limited (ASL) shall take all reasonable steps including framing of appropriate policies and procedures to minimize conflict of interest between Adam Securities Limited (ASL) and its customers.
2. Where any conflict of interest arises between ASL and its customer, ASL shall immediately inform the customer through verifiable means and not gain any direct or indirect advantage from the situation and shall act in the best interest of the customer.
3. ASL must take reasonable steps to ensure that neither ASL nor any of its employees or accredited representatives either offers or gives or solicits or accepts, any inducement that is likely to conflict with any duties owed to the customer.
4. ASL shall disclose the names of such persons to its customers who are working as its accredited representatives.
5. ASL shall put in place a mechanism to resolve any conflict of interest that may arise in the conduct of business and take all reasonable steps to resolve all conflict of interest in an equitable manner.
6. Where ASL has a material interest in a transaction to be entered into with or for a customer or a relationship which gives rise to a conflict of interest in relation to such a transaction, ASL shall not knowingly either advise, or deal in the exercise of discretion, in relation to that transaction unless ASL has:
   1. Disclosed that material interest or relationship, as the case may be, to the customer;
   2. Take reasonable steps to ensure that neither the material interest nor the relationship adversely affects the interest of the customer;
7. In case of any breach of policies by its employees and accredited representatives, ASL shall promptly investigate, and take appropriate action against the person responsible.