

AY Securities and Commodities Limited

Policies and Internal Procedures / Internal Code of Conduct for the Company, its Authorized Persons and its Employees for Dealing with Conflicts of Interest in performance of their Activities

1. All associated with us are required to ensure that there is no conflict of interest is arising during the course of operations and the company has issued guidelines from time to time for showing possible area of conflict of interest.
 2. The internal code of conduct governing risk management policy, acceptance of new clients, due diligence etc and other operational matters shall ensure that no conflict of interest arises.
 3. All concern are expected to maintain highest standard of integrity and totally impartial in dealing with different matters.
 4. All concerned shall ensure that their personal interest is no way affecting in performance of their duties. In the process, client interest would be supreme and all will be required to ensure the same.
 5. All concerned shall appropriately disclose at all time that their personal interest and conflict of interest is not coming in the way of performing the duties.
 6. The rights to modify different software used by organization are subject to management approval.
 7. No client shall trade/ transact in a specific commodity to manipulate the demand and supply of the commodity and try to hamper free, fair and just price discovery process.
 8. Company shall ensure no incentive schemes are offered to encourage enhance volume not matching with risk profile of the clients which is not commensurate with the risk management policy of the organization.
 9. No dealer, authorized person or employee is allowed to share the information obtained by them as a result of their dealing which is conflicting of personal interest. The company shall from time to time provide training to employees, authorized persons and clients for identifying elimination of conflict of interest situation arising from time to time and compliance officer is required to report to the board of organization on the same as board is expected to review the same.
 10. Company shall also review other policies and shall ensure wherever the conflict of interest is arising shall be eliminate immediately.
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