

**WEALTHSTREET FINANCIAL SERVICES PRIVATE LIMITED**

**CONFLICT OF INTEREST POLICY**

<b>Policy Version</b>	2.0
<b>Effective Date</b>	25.03.2026
<b>Review Frequency</b>	Annually or upon regulatory change
<b>Prepared By</b>	Compliance Department
<b>First Approval</b>	Operations Committee
<b>Final Approval</b>	Internal Committee/ Board of Directors

**Wealthstreet Financial Services Private Limited**

*Formerly Known as Wealthstreet Advisors Private Limited*

**CIN: U74999GJ2016PTC094432**

**Regd. Off :** A-1101, Mondeal Heights, 11th Floor, Besides Wide Angle, S.G Highway, Ahmedabad-380015

**P :** +91 79 66775500 • **E :** info@wealthstreet.in • **W :** www.wealthstreet.in

## 1. Regulatory Background

This Policy is framed in accordance with the guidelines issued by the Securities and Exchange Board of India, including SEBI Circular No. CIR/MIRSD/5/2013 dated August 27, 2013, and other applicable regulations, circulars, and codes of conduct prescribed for intermediaries in the securities market, as amended from time to time.

The Company is committed to ensuring adherence to the highest standards of integrity, fairness, and transparency in its dealings with clients and stakeholders.

## 2. Objective

The objective of this Policy is to:

- Identify situations that may give rise to actual or potential conflicts of interest;
- Establish mechanisms to prevent, manage, and disclose such conflicts;
- Ensure that client interests are protected at all times; and
- Promote fair practices and ethical conduct across all business activities.

## 3. Scope

This Policy applies to:

- The Company;
- Directors and Key Managerial Personnel;
- Employees and Associated Persons (as defined under applicable SEBI regulations);
- Authorized Persons and any other persons acting on behalf of the Company.

## 4. Definition of Conflict of Interest

A conflict of interest refers to any situation where:

- The interests of the Company or its associated persons conflict with those of a client; or
- Personal, financial, or other considerations compromise or have the potential to compromise professional judgment and objectivity.

## 5. Key Principles

The Company shall adhere to the following principles:

### 5.1 Client Interest First

Client interests shall always take precedence over the interests of the Company or its employees.

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## **5.2 Fair and Equitable Treatment**

All clients shall be treated fairly and without discrimination.

## **5.3 Transparency and Disclosure**

All material conflicts of interest shall be adequately disclosed to clients in a clear and timely manner.

## **5.4 Integrity and Ethical Conduct**

The Company shall maintain high standards of honesty, integrity, and professionalism in all dealings.

## **6. Identification of Conflict of Interest**

Conflicts of interest may arise in, but are not limited to, the following situations:

- Personal trading by employees ahead of client orders;
- Receipt of incentives or commissions that may bias recommendations;
- Handling of unpublished price sensitive information (UPSI);
- Preferential treatment to certain clients;
- Business relationships that may influence objectivity.

## **7. Measures to Prevent and Manage Conflicts**

The Company shall implement the following controls:

### **7.1 Chinese Walls**

Establish internal information barriers to prevent misuse or flow of confidential or price-sensitive information.

### **7.2 Disclosure Mechanism**

- All employees must disclose any actual or potential conflict to the Compliance Officer immediately;
- The Company shall make appropriate disclosures to clients wherever required.

### **7.3 Restriction on Insider Trading**

- No person shall trade while in possession of UPSI;
- Strict compliance with insider trading regulations shall be ensured.

### **7.4 Segregation of Duties**

Functions involving potential conflicts shall be segregated to ensure independence and objectivity.

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### **7.5 Client Suitability**

Products and services shall be offered strictly based on client risk profile and suitability, without any bias due to incentives.

### **7.6 Confidentiality**

Client information shall be kept strictly confidential and shall not be used for personal gain or disclosed without authorization.

### **7.7 Prohibition of Market Manipulation**

The Company and its associated persons shall not engage in any activity that may manipulate market prices or volumes.

## **8. Reporting and Escalation**

- Any conflict of interest identified must be reported to the Compliance Officer without delay;
- The Compliance Officer shall evaluate and determine appropriate mitigation measures;
- Significant conflicts shall be escalated to Senior Management and, where required, to the Board.

## **9. Roles and Responsibilities**

### **Board of Directors**

- Approve and periodically review this Policy;
- Ensure adequate systems are in place for implementation.

### **Compliance Officer**

- Monitor adherence to the Policy;
- Maintain records of conflicts and disclosures;
- Provide guidance on conflict management.

### **Employees and Associated Persons**

- Adhere strictly to this Policy;
- Promptly disclose conflicts;
- Act in the best interest of clients at all times.

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## 10. Implementation Framework

The Company shall:

- Conduct periodic training and awareness programs;
- Establish internal controls and audit mechanisms;
- Maintain documentation and audit trails for conflict management;
- Review incentive structures to avoid misaligned interests.

## 11. Review of Policy

This Policy shall be reviewed:

- At least annually; or
- As and when required due to regulatory changes or business needs.

Any amendments shall be approved by the Board of Directors.

## 12. Conclusion

The Company is committed to proactively identifying, managing, and mitigating conflicts of interest to ensure protection of client interests and compliance with applicable regulatory requirements.

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