

GLOBE CAPITAL (IFSC) LIMITED

Policy on Conflict of Interest

This Policy shall be applicable to all the Employees of the Globe Capital (IFSC) Limited.

- All the Employees are required to ensure that there is no conflict of interest is arising during the course of operations and the company issued the guidelines from time to time for the showing possible area of conflict of interest.
- All concern are expected to maintain highest standard of integrity and totally impartial in dealing with different matters.
- 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.
- All concerned shall ensure that their personal interest is no way affecting in performance of their duties. In the process clients interest would be supreme and all will be required to ensure the same.
- 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.
- The rights to modify different software used by organization are restricted to the Managing Director.
- 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.
- No 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 and Board is expected to review the same.
- Company shall also review all other policies and shall ensure wherever the conflict of interest is arising shall be eliminate immediately.

All concerned intermediately shall issue the attached declaration with reference to above policy.