Conflict of Interest Statement Policy of Sampati Securities Limited

Prepared by Legal & Compliance Team

SAMPATI SECURITIES LIMITED

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Summary of Policy

Version	Issue and Effective Date	Review Periodicity	Approving Authority	Policy Owner	Confidentiality level
V1	09.04.2024	As and when require/any change in regulatory requirement	Board of Directors	Legal and Compliance Team	Confidential
V2	03.04.2026	As and when require/any change in regulatory requirement	Board of Directors	Legal and Compliance Team	Confidential

Details of Last Review

Review Date	Next Review Date	Comments/Remarks/Changes
09.04.2024	April 2025	(i) Reviewed in accordance with the Master Direction - Reserve Bank of India (Non-Banking Financial Company - Scale Based Regulation) Directions, 2023
03.04.2026	April 2027	(ii) Reviewed in accordance with Reserve Bank of India (Non-Banking Financial Companies - Governance) Directions, 2025

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Introduction:

This Conflict of Interest Statement is issued by Sampati Securities Limited (Herein after referred as "SSL") in compliance with the directives laid down by the Reserve Bank of India (RBI) regarding the management and disclosure of conflicts of interest within the company.

SSL is committed to upholding the highest standards of integrity, transparency, and ethical conduct in all its operations. As a regulated entity under the purview of the RBI, we recognize the significance of identifying, managing, and disclosing any conflicts of interest that may arise in the course of our business activities.

Definition of Conflict of Interest:

A conflict of interest arises when the personal, professional, or financial interests of individuals associated with SSL, conflict or appear to conflict with the interests of the company, its clients, or its stakeholders. Conflicts of interest may arise in various situations, including but not limited to:

- Personal financial interests of directors, officers, or employees.
- Business relationships with related parties.
- Transactions involving potential conflicts between the interests of the company and its clients.
- Receipt of gifts, favors, or other benefits that could compromise objectivity.
- Participation in activities that compete with or detract from the interests of SSL.

Identification and Disclosure:

SSL is committed to proactively identifying and disclosing potential conflicts of interest to relevant stakeholders. We have implemented robust mechanisms for:

- Regularly assessing business activities and relationships to identify potential conflicts.
- Encouraging employees to promptly report any actual or perceived conflicts of interest.
- Maintaining clear channels of communication for stakeholders to raise concerns regarding conflicts of interest.

Management and Mitigation:

Upon identification of a conflict of interest, SSL will take appropriate steps to manage and mitigate the conflict, including but not limited to:

- Implementing internal controls and procedures to prevent conflicts from arising.
- Establishing guidelines for conducting transactions with related parties.
- Providing training and guidance to employees on recognizing and addressing conflicts of interest.
- Where conflicts cannot be fully mitigated, disclosing relevant information to affected parties and seeking their informed consent.

Non-Tolerance Policy:

SSL maintains a zero-tolerance policy towards conflicts of interest that undermine the integrity or interests of the company, its clients, or its stakeholders. Any employee found to be engaged in activities that create or perpetuate conflicts of interest may be subject to disciplinary action, up to and including termination of employment.

Reporting and Review:

SSL regularly reviews its policies, procedures, and practices related to conflicts of interest to ensure their effectiveness and compliance with regulatory requirements. Additionally, all directors, key managerial personnel and senior management personnel are require to submit a conflict of interest statement to the company on annual basis as per the format provided by the company, which shall be laid before the board for review and noting. Further, all employees are encouraged to report any concerns or observations regarding conflicts of interest through established reporting channels which includes reporting of the instances to the chairman of audit committee of the company, without fear of reprisal.

Conclusion:

SSL is committed to maintaining the trust and confidence of its clients, investors, regulators, and the public through transparent and ethical business practices. By adhering to the principles outlined in this Conflict of Interest Statement, we aim to uphold the highest standards of integrity and accountability in all our interactions.

This Conflict of Interest Statement shall be reviewed periodically and updated as necessary to reflect changes in regulatory requirements or business practices.

SAMPATI SECURITIES LIMITED

Annexure - A

Conflict of Interest Declaration Statement (annual)

I, ______________________________ (name), pledge to comply with the conflict of Interest statement of Sampati Securities Limited.

As a director, key managerial personnel/senior management personnel or other interested party, I shall not discuss whether verbally or in writing or vote on any matter in which I have a conflict, or potential conflict of interest, or any interest, which might reasonably appear to be in conflict with the concept of fairness when dealing with the business of the company.

I acknowledge that a conflict of interest or a potential conflict occurs if:

a) I as an individual have a self, monetary, or other interest, either direct or indirect; and/or

b) the Organization/company that I represent may have a financial, administrative, or programmatic interest in issues or transactions under consideration with the company in any manner.

I hereby certify that I have read and understood the Conflict of Interest Policy. I confirm that I will adhere to the Conflict of Interest statement policy that requires me to declare a conflict or potential conflict of interest on a particular issue to the company. In such cases, I shall excuse myself from the board/committee meeting discussions and voting concerning the matter in question.

I further acknowledge that I am obliged to raise any conflict of interest I may be aware of amongst other members of the company or implementing organizations to safeguard the company's reputation and ensure it adheres to ethical standards, and conducts business in a balanced and transparent manner.

In keeping with the above principles and those further stated in the Conflict of Interest Policy, I would like to declare as follows for the current year: (Tick the item that applies)

- ☐ I do not have any foreseeable conflict of interest that relates to the functions and operations of the company.
- ☐ I have a conflict of interest.

Describe in brief the nature of the conflict of interest:

Name of the Director/Key Managerial Personnel/Senior Management Personnel:______________________________

SAMPATI SECURITIES LIMITED

Signature:______________________________

Date and Place: ______________________________