POLICY ON DEALING WITH CONFLICT OF INTEREST

INTRODUCTION:

A.K. Group of Companies ("A.K. Group") conducts its business according to the principle that it must manage conflicts of interest fairly, both between itself and its Clients and between one Client and another.

For the purpose of this Policy, A.K. Group includes A. K. Capital Services Limited (the "Company") and its following subsidiaries:

i. A. K. Capital Finance Limited (AKCFL)
ii. A. K. Stockmart Private Limited (AKSPL)
iii. A. K. Wealth Management Private Limited (AKWMPL)
iv. A. K. Capital Corporation Private Limited (AKCCPL)
v. Family Home Finance Private Limited (FHFPL)

SCOPE:

This Policy is designed to take all reasonable steps to maintain and operate effective organizational and administrative arrangements to identify and manage relevant conflicts.

Senior management of A.K. Group is responsible for ensuring that the systems, controls and procedures are adequate to identify and manage Conflicts of Interest. The Compliance and Legal Departments of the Company assist in the identification and monitoring of actual and potential Conflicts of Interest.

The Company has in place business-specific procedures that address the identification and management of actual and potential Conflicts of Interest that may arise in the course of its business.

GENERAL GUIDANCE:

In identifying Conflicts of Interest, facts and circumstances of the case will be considered. Senior Management will also take into account, inter alia, whether the Company or its representatives, directors, employees, officers and others:

i. Is likely to make a financial gain, or avoid a financial loss, at the expense of the Client;

ii. Has an interest in the outcome of a service provided to the Client or of a transaction carried out on behalf of the Client, which is distinct from the Client's interest in that outcome;

iii. Has a financial or other incentive to favor the interest of a Client or group of Clients over the interests of another Client;

iv. Receives or will receive from a person other than the Client an inducement in relation to a service provided to the Client, in the form of monies, goods or services, other than the standard brokerage, commission or fee for that service.

NON-EXHAUSTIVE EXAMPLES OF WHAT MAY BE CONSIDERED TYPICAL CONFLICTS OF INTEREST THAT MAY ARISE IN RELATION TO INVESTMENT SERVICES PROVIDED BY A.K. GROUP:

i. Engaging in business and trading activities for its own account and/or Client accounts whilst other Clients are active in relevant markets at the same time (Proprietary Trading).

ii. The Company may provide investment advice or discretionary portfolio management services to its Clients and the Company may also recommend or sell products issued by itself or affiliated companies.

iii. AWMPL is the discretionary portfolio manager for more than one Client– in particular in respect of issues related to allocation.

iv. Any of the entity of A.K. Group may have a revenue-sharing arrangement with vendor/ service provider/ issuer of securities whose recommendation may be given to a client.

v. Related Party Transactions

DISCLOSURE OF CONFLICTS OF INTEREST AND CLIENT CONSENT:

A.K. Group has procedures to protect the Client's interests from conflicts that might arise from its own set of activities. In certain circumstances, if some Conflict of Interest remains and, where permissible by the law for the time being in force, disclosure to an affected Client may be made in order to seek Client consent to act. Disclosure will be made of the general nature and / or sources of conflict to enable the Client to make an informed decision.

MEASURES OF CONTROL FOR IDENTIFICATION AND MANAGEMENT OF CONFLICTS OF INTERESTS:

In managing a Conflict of Interest, it may be appropriate to use additional measures in the event that existing ongoing conflicts management measures are not sufficient to adequately manage the potential conflict, such as the following:

i. Implementation of ad hoc transaction specific Chinese Walls or other additional information segregation methods following consideration of all of the facts available to relevant management;

ii. Escalation to senior management who have responsibility for the strategy of A.K. Group and an appreciation of the relationship and reputation risks that may arise;

iii. Declining to act.

INFORMATION BARRIERS:

A.K. Group respects the confidentiality of information it receives about its Clients and operates a "Need to Know" approach and complies with all applicable laws with respect to the handling of that information. Access to confidential information is restricted to those who have a proper requirement for the information consistent with the legitimate interest of a Client or A.K. Group.

REVIEW OF CONFLICTS OF INTEREST POLICY:

This policy shall be reviewed and updated as and when required.

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