

J. G. Shah Financial Consultants Pvt. Ltd.

Conflicts of Interest Policy

Introduction

J. G. Shah Financial Consultants Pvt. Ltd. is bound by FCA Principles for Business, where Principle 8 states “ A firm must manage conflicts of interest fairly, both between itself and its customers and between a customer and another client”.

The principal activities of J. G. Shah Financial Consultants Pvt. Ltd. are the provision of investment services to retail (previously private) clients, professional (previously intermediate) clients.

As a result, a variety of conflicts may arise between J. G. Shah Financial Consultants Pvt. Ltd. conflicts and those of its clients and between the interests of different clients. Consequently, J. G. Shah Financial Consultants Pvt. Ltd. has an obligation to:

1. take all reasonable steps to identify conflicts of interest between
 - (i) J. G. Shah Financial Consultants Pvt. Ltd. and its clients and
 - (ii) one client and another;
2. maintain and operate effective organisational and administrative arrangements with a view to taking reasonable steps designed to prevent conflicts of interest from giving rise to a material risk of damaging clients’ interests;
3. disclose any conflicts that cannot be managed effectively by our organisational and administrative arrangements to ensure that clients’ interests will not be damaged; and
4. maintain records of J. G. Shah Financial Consultants Pvt. Ltd. services and activities in which conflicts may arise.

Disclosure of conflicts

To identify the types of conflicts of interest which may arise, we take into account whether J. G. Shah Financial Consultants Pvt. Ltd. or an employee:

- a) is likely to make a profit or avoid a loss at the expense of the client;
- b) has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of a client, which is distinct from the client’s own interest in that outcome;
- c) has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client;
- d) carries on the same business as the client;

- e) 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; or
- f) could be in a position where its ability to act in a client's best interests is potentially affected by any other matter.

We also seek to identify any situation where the interest of one client may conflict with those of another, in order to ensure fair treatment for each client.

Managing Conflicts of Interests

J. G. Shah Financial Consultants Pvt. Ltd. has in place policies and procedures which should enable us to manage conflicts of interest when they arise, in particular including those listed below. We may need to take additional steps in particular cases and these will be determined by the Compliance Officer on a case-by-case basis. In most cases, we believe these procedures are sufficient to prevent risks to clients, but we disclose in our terms of business the conflicts which may arise in case in any particular situation these procedures are not alone sufficient.

Independence Policy

We operate a formal independence policy for the business which stipulates that whenever an investment adviser gives advice or recommends a transaction to a client, that individual should disregard any relationship, arrangement or interest of his own, or of the firm which might influence the advice or recommendation.

Best Execution

Our policies for acting in clients' best interests when executing orders and passing orders to third parties for execution are designed to ensure that we meet out best execution obligations regardless of any other interests.

Chinese Walls

Chinese Walls are formal arrangements that require information held by a person in one part of the business to be withheld from, or not to be used for, people in another part of the business. If non public information is to be passed to an employee on the other side of the Chinese Wall, it must be authorised and recorded by the Compliance Officer.

Allocation Policy

Before allocating investments to clients, we comply with our regulatory obligations to assess suitability or appropriateness. It is our policy to offer allocations to clients for whom the investment is suitable or appropriate, who have sufficient funds in their account on the commitment date and who understand the investment's terms and conditions and are willing to be bound by them (including any special considerations attached to placings, such as selling restrictions, which are generally for a limited period of time). Our policy is to allocate investments on a pro rata basis wherever practicable.

PA Dealing

J. G. Shah Financial Consultants Pvt. Ltd. has detailed policies and procedures to monitor employees' personal account dealing and in certain circumstances restrict dealing as employees' interests in holding or dealing in securities may conflict with the obligations to clients.

Inducements/Gifts/Hospitality

Employees must not solicit nor accept any inducements which may conflict with J. G. Shah Financial Consultants Pvt. Ltd. obligations to clients, nor offer inducements which could conflict with the recipient's obligations to its own clients. Procedures are in place on the giving or receiving gifts or hospitality. We have procedures to comply with FCA rules on inducements. We do not receive benefits from brokers in connection with the placing of orders with them.

Remuneration Policy

J. G. Shah Financial Consultants Pvt. Ltd. will take care to ensure that it does not give incentives to activities that may lead to conflicts. We will not offer remuneration packages that reward behaviour that disadvantages the interests of clients in favour of J. G. Shah Financial Consultants Pvt. Ltd. or other clients. Staff are rewarded on the basis of merit.