



1. Objective

This Conflict-of-Interest Policy aims to identify, prevent, and manage actual or potential conflicts of interest that may arise in the course of Das Capital Private Limited's (Company) business as Mutual Fund Distributor (MFU) registered with AMFI and regulated by the Securities and Exchange Board of India (SEBI).

The purpose is to ensure that investor interests remain paramount and that all employees, directors, and representatives of the Company conduct themselves with integrity, transparency, and fairness in accordance with SEBI and AMFI standards.

2. Regulatory Framework

- SEBI (Mutual Funds) Regulations, 1996 and relevant circulars issued from time to time.
- AMFI Code of Conduct for Mutual Fund Distributors (effective April 2012).
- SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- SEBI (Investment Advisors) Regulations, 2017 - to ensure separation between distribution and advisory functions.
- SEBI Master Circular on Mutual Funds (latest version).
- AMFI Guidelines on Distributor Due Diligence, Commission Disclosure, and Conduct.

CONFLICT OF INTEREST POLICY

3. Scope and Applicability

This Policy applies to all Directors, Employees, Authorized Persons, Sub-distributors, and Representatives of Das Capital Private Limited. It covers all business operations, client interactions, and third-party engagements undertaken by the Company.

4. Definition of Conflict of Interest

A conflict of interest occurs when the Company or any of its personnel have competing professional or personal interests that may impair, or appear to impair, their objectivity, independence, or ability to act in the best interests of investors.

5. Guiding Principles

- Investor First - The interest of investor shall always take precedence over that of the Company or its employees.
- Transparency - Full and fair disclosure shall be made to clients regarding commission, relationships with AMFI or any benefit derived from transactions.
- Fairness - All clients shall be treated equally.

DAS CAPITAL PRIVATE LIMITED

CIN - U74140KA2006PTC041321

Reg. Office- No 26, Old No 401,402, Splendid Tower, Wheeler Road, Cox Town,

Bangalore, 560005, Karnataka

Email Id: - backoffice@dascap.com

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- Transparency – Full and fair disclosure shall be made to clients regarding commissions, relationships with AMCs, or any benefit derived from transactions.
- Fairness – All clients shall be treated equitably; recommendations shall be based on suitability and not remuneration.
- Accountability – Every employee and director is responsible for identifying and disclosing any potential conflict to the Compliance Officer.
- Documentation – All identified conflicts and their resolutions shall be recorded and periodically reviewed.

6. Areas Where Conflicts May Arise

Potential conflicts of interest may include, but are not limited to, the following situations:

Area	Possible Conflict	Mitigation / Control
Product Recommendation	Recommending mutual fund schemes that pay higher commissions rather than those suitable for the investor.	Adoption of suitability policy; commission disclosure to clients; periodic compliance audit.
Multiple AMCs Relationship	Favoring one AMC over another due to commercial arrangements.	Maintain arm's-length relationship; product neutrality declaration.
Employee Personal Investment	Employees investing in same schemes recommended to clients for personal benefit.	Pre-trade approval or disclosure of employee investments; monitoring by Compliance Officer.
Revenue Sharing / Rebates	Receiving unauthorized incentives or gifts from AMCs or third parties.	Strict prohibition of rebates, soft commissions, or gifts above approved threshold.
Dual Role (Advisory & Distribution)	Providing investment advice while earning commissions from product sales.	Segregation of activities; clients informed that services are distribution-only unless registered as Investment Adviser.
Outside Business Interest	Director or employee has financial interest in AMC, RTA, or intermediary.	Mandatory declaration of external interests annually; prior approval for related-party dealings.

7. Identification and Disclosure of Conflicts

All personnel shall immediately disclose any actual or potential conflict of interest to the Compliance Officer in writing. The Compliance Officer shall maintain a Conflict Register and take appropriate action. Relevant disclosures will be made to clients, AMFI, SEBI, or AMCs as required.

8. Management of Conflicts

- Establish and enforce Chinese walls between business functions where required.
- Restrict access to confidential client data to authorized personnel only.
- Avoid differential treatment of clients based on relationship, size, or profitability.
- Ensure all client recommendations are backed by suitability and risk assessment documentation.
- Conduct periodic internal compliance reviews to detect and correct any conflict situations.
- Implement a whistle-blower mechanism enabling employees to report unethical behaviour or conflicts confidentially.

9. Disclosure to Clients

Before or at the time of recommending any investment, the Company shall disclose in writing: the nature of its relationship with the AMC, commissions or trail income, and any potential conflict of interest that may influence the recommendation.

10. Oversight and Responsibility

Role	Responsibility
Board of Directors	Approve and periodically review the Conflict-of-Interest Policy.
Compliance Officer	Implement and monitor adherence; maintain conflict registers; report material issues to the Board.
Grievance Officer	Address investor complaints arising from alleged conflicts of interest.
All Personnel	Disclose and avoid situations that could lead to conflicts.

11. Review and Updates

This Policy shall be reviewed annually or earlier if there are significant regulatory changes or new conflict situations identified. Any amendments shall be approved by the Board of Directors and communicated to all employees.

12. Disciplinary Action

Failure to comply with this Policy or concealment of a known conflict shall result in disciplinary action, including termination, suspension, or reporting to regulatory authorities as appropriate.

13. Disclosure on Website

Das Capital Private Limited and its associates may earn distribution commissions from AMCs for mutual fund investments made through us. The rate of commission for each AMC is available upon request.

14. Effective Date

This Policy is effective from 1st April 2021 and supersedes all prior versions or informal practices related to conflict management.

For

Das Capital Private Limited



Authorized Signatory

Director

Place: Bangalore, India

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Board of Directors	Approve and periodically review the Conflict-of-Interest Policy
Compliance Officer	Implement and monitor adherence; maintain conflict registers; report material issues to the Board
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