



Conflict of Interest Policy

Entity Name	Manog Securities Pvt Ltd
SEBI Registration No.	INZ000278434
Compliance Officer	Pawan Pratap Singh
Date of Adoption	28-JAN-2026

1. Policy Objective

Manog Securities Pvt Ltd conducts both client-facing broking and proprietary trading. This Policy identifies, discloses, and manages conflicts of interest — ensuring client interests are always protected and the Firm's own interests do not compromise its obligations to clients or to market integrity.

2. Scope

This Policy applies to all Partners / Directors, employees, dealers, and Authorised Persons (APs) of the Firm.

3. Proprietary Trading vs. Client Trading

- Client orders shall always take priority over proprietary orders in the same scrip
- Front-running is strictly prohibited: **No employee or Partner shall place proprietary orders based on knowledge of pending large client orders**
- Proprietary positions maintained in accounts completely separate from client accounts — information barrier enforced
- Client margins shall not be used for proprietary trading under any circumstance

4. Insider Trading — SEBI (PIT) Regulations 2015

- No employee or AP shall trade when in possession of **Unpublished Price Sensitive Information (UPSI)**
- Compliance Officer to maintain a Restricted List of securities — trading prohibited when UPSI is known to the Firm
- No employee shall communicate UPSI to any person including family members
- Employee becoming aware of UPSI must immediately report to Compliance Officer for Restricted List update

5. Unauthenticated News — SEBI Master Circular Para 85

- No employee or AP shall circulate unverified market-sensitive information through any channel — **email, WhatsApp, Telegram, social media, chat forums, or messaging apps**
- Market-related communication to clients must be sourced from verified, publicly available information only
- Annual training on this prohibition — minimum **1 hour**. Attendance mandatory. Records maintained for 5 years

6. Personal Trading — Employees and APs

- All employees and APs to disclose personal trading accounts to the Compliance Officer
- Employees with client order information shall not execute personal trades in those securities on the same day
- Personal trades to be reported to Compliance Officer monthly

7. Incentive Schemes

- No incentive scheme shall encourage trading volumes inconsistent with the client's risk profile
- Any incentive scheme for APs or employees to be reviewed by Compliance Officer before implementation

8. Software Modification Controls

- Changes to critical trading/back-office software require written approval from **[Managing Director / Partner]** and Compliance Officer

- All changes tested in UAT environment before production deployment
- Material changes to trading systems to be intimated to the Exchange before deployment

9. Annual Declaration

All persons covered by this Policy shall submit an Annual Conflict of Interest Declaration to Compliance Officer.

I, (Name):	_____
Designation:	_____
Declare:	I have no personal interest conflicting with my duties. I have not traded on UPSI. I have not circulated unauthenticated news. I have not front-run any client order.
Disclosed conflicts (if any):	_____
Signature:	_____
Date:	_____

Policy Review

Last Reviewed	11-FEB-2026
Reviewed By	Pawan Pratap Singh (Compliance Officer)
Approved By	Director

For and on behalf of: Manog Securities Pvt Ltd

Authorised Signatory	Mr. Vivek Gupta
Designation	Director
Date	11-FEB-2026
Signature	<u>For Manog Securities Pvt. Ltd.</u>