

CLIENT REFERRAL/INCENTIVE POLICY

BACKGROUND:

This Policy is framed in accordance with NSE Circular No. NSE/INSP/43029, dated: December 26, 2019, NSE Circular No. NSE/INSP/43824, dated: March 11, 2020, BSE Circular No. 20191227-39, dated: December 26, 2019 and BSE Circular No. 20200311-57, dated: March 11, 2020; which states that all the trading members are required to have an appropriate policy framework w.r.t. quantum/maximum limit on the incentive to be provided to the referring person.

OBJECTIVE OF THE POLICY:

This policy is framed to deal with quantum/maximum limit on the incentive to be provided to the referring person. Sunflower Broking Private Limited has adopted following guidelines while offering such incentives/referral to the referring person:

1. For a particular referring person, the rate of the incentive will be flat (i.e. not slab based) and a single rate will be applied. We may apply different referral incentive rates across different referring person.
2. The referring person will not undertake any form of selling/advisory activities in secondary market w.r.t securities and will not manage the portfolio of any person who is being referred. His/her role will be strictly limited to "Referral" only.
3. The referred client will not be subjected to any kind of trade inducement by the referring person and it will be ensured that all instructions for placement of orders are obtained from the respective clients only.
4. All the details/information pertaining to the client will be maintained confidentially and the same will not be disclosed to any person except as required under any law/regulatory requirements or with the express written permission of the client.
5. All correspondences viz. Contract Notes, Daily Margin Statement, Statement of Accounts, Annual Global Transaction Statements etc. will be sent to the respective client only and under no circumstances will go to the referring person.
6. The referring person will not be allowed to conduct IPV/OSV. However, referring person who is under obligation to undertake IPV/OSV under their respective governing regulations, may continue to do so.
7. Incentive amount will not be recovered from the client being referred and no obligation whatsoever will be cast on such client. There will be no financial transaction between the referred client and the referring person under the arrangement.

We will also comply with code of conduct prescribed for Stock Brokers under Regulation 9 of SEBI (Stock Brokers) Regulations, 1992 and all relevant Byelaws, Rules & Regulations and of SEBI/ Exchange w.r.t. sharing of Brokerage, Account Opening, Inducement to Trade, Sales Practices, Orders Placement etc. issued from time to time.

Registered Office

"Sunflower House", 5th Floor, Nr. Bhaktinagar Circle,
Rajkot-360002. Ph: 0281-236-1935

Corporate Office

A-501, Privilon Building, Near Iscon Temple, SG Highway,
Bodakdev, Ahmedabad-380054. Ph: 079-4039-6993

IMPLEMENTATION AND REVIEW OF POLICY:

This policy shall come into effect from the date of approval of the Board of Directors of the company for its implementation and that the same will be reviewed on annual basis or as and when there are any changes introduced by any Regulatory Authority or as and when it is found necessary to change on account of Business needs and Risk Management Policy.

Registered Office

“Sunflower House”, 5th Floor, Nr. Bhaktinagar Circle,
Rajkot-360002. Ph: 0281-236-1935

Corporate Office

A-501, Privilon Building, Near Iscon Temple, SG Highway,
Bodakdev, Ahmedabad-380054. Ph: 079-4039-6993