

Code of Conduct

In accordance with the third schedule of IA Regulations u/r 15(9) of the IA Regulations which covers the Code of conduct for investment adviser

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| (i) | Honesty and fairness | I / We shall act honestly, fairly and in the best interests of my / our clients and in the integrity of the market. |
| (ii) | Diligence | I / We shall act with due skill, care and diligence in the best interests of my / our clients and shall ensure that my / our advice is offered after thorough analysis and taking into account available alternatives. |
| (iii) | Capabilities | I / We shall have and employ effectively appropriate resources and procedures which are needed for the efficient performance of my / our business activities. |
| (iv) | Information about clients | I / We shall seek from my / our clients, information about their financial situation, investment experience and investment objectives relevant to the services to be provided and maintain confidentiality of such information. |
| (v) | Information to its clients | I / We shall make adequate disclosures of relevant material information while dealing with my / our clients. |
| (vi) | Fair and reasonable charges | I / We advising my / our client may charge fees, subject to any ceiling as may be specified by the Board. I / We shall ensure that fees charged to my / our clients is fair and reasonable. |
| (vii) | Conflicts of interest | I / We shall try to avoid conflicts of interest as far as possible and when they cannot be avoided, I / we shall ensure that appropriate disclosures are made to my / our clients and that the clients are fairly treated. |
| (viii) | Compliance | I / We, the investment adviser including its partners, principal officer and persons associated with investment advice, as the case may be, shall comply with all regulatory requirements applicable to the conduct of my / our business activities so as to promote the best interests of clients and the integrity of the market. |
| (ix) | Responsibility of senior management | In case of we being the body corporate, which is registered as investment adviser, our senior management shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures by us. |