CODE OF CONDUCT FOR INVESTMENT ADVISER

1. **HONESTY AND FAIRNESS**
   An Investment Adviser shall act honestly, fairly, and in the best interests of its clients and the integrity of the market.

2. **DUE SKILL, CARE AND DILIGENCE**
   An Investment Adviser shall act with due skill, care, and diligence in the conduct of all investment advisory activities.

3. **CLIENT INTERESTS**
   An Investment Adviser shall place the interests of the client above its own interests.

4. **DISCLOSURE OF MATERIAL INFORMATION**
   An Investment Adviser shall make adequate disclosures of all material information, including any actual or potential conflicts of interest, to its clients in a clear and timely manner.

5. **NO MISREPRESENTATION**
   An Investment Adviser shall not make any untrue statement or omit to state a material fact, nor shall it make any misleading representation or exaggerated claims.

6. **CONFIDENTIALITY**
   An Investment Adviser shall maintain confidentiality of all information relating to clients and shall not disclose such information unless required by law or with the consent of the client.

7. **PROFESSIONAL CONDUCT**
   An Investment Adviser shall conduct its business in a professional manner and shall not engage in any act involving fraud, dishonesty, or deceit.

8. **COMPLIANCE WITH REGULATORY REQUIREMENTS**
   An Investment Adviser shall comply with all applicable provisions of the SEBI Act, the SEBI (Investment Advisers) Regulations, 2013, and circulars, guidelines, or directions issued by SEBI from time to time.

9. **NO ASSURED RETURNS**
   An Investment Adviser shall not promise or guarantee any assured or fixed returns to clients.

10. **GRIEVANCE REDRESSAL**
    An Investment Adviser shall ensure that client grievances are redressed promptly and appropriately.

11. **COOPERATION WITH REGULATORY AUTHORITIES**

An Investment Adviser shall cooperate with SEBI and any other regulatory authority in any inspection, inquiry, or investigation.