

CREST WEALTH MANAGEMENT PRIVATE LIMITED

PORTFOLIO MANAGEMENT SERVICES

CODE OF CONDUCT

1. Crest Wealth Management Private Limited (Crest Wealth), in the conduct of its business, shall observe high standards of integrity and fairness in all its dealings with its clients and other portfolio managers.
2. The money received by Crest Wealth from its client for an investment purpose would be deployed by it as soon as possible for that purpose and money due and payable to a client would be paid forthwith.
3. Crest Wealth shall render at all times high standards of service, exercise due diligence, ensure proper care and exercise independent professional judgment. Crest Wealth would either avoid any conflict of interest in his investment or disinvestment decision, or where any conflict of interest arises, would ensure fair treatment to all his customers and it shall disclose to the clients, possible source of conflict of duties and interests, while providing unbiased services. Crest Wealth would at all times place its clients interest above itself.
4. Crest Wealth shall not make any statement or become privy to any act, practice or unfair competition, which is likely to be harmful to the interests of other portfolio managers or is likely to place such other portfolio managers in a disadvantageous position in relation to it, while competing for or executing any assignment.
5. Crest Wealth shall not make any exaggerated statement, whether oral or written, to the client either about the qualification or the capability to render certain services or his achievements in regard to services rendered to other clients.
6. At the time of entering into a contract, Crest Wealth shall obtain in writing from its client, his interest in various corporate bodies which enables him to obtain unpublished price-sensitive information of the body corporate.
7. Crest Wealth shall not disclose to any clients, or pass any confidential information about its client, which has come to its knowledge.
8. Crest Wealth shall where necessary and in the interest of the client take adequate steps for registration of the transfer of the clients' securities and for claiming and receiving dividends, interest payments and other rights accruing to the client. We shall also take necessary action for conversion of securities and subscription/renunciation of/or rights in accordance with the clients' instruction.

9. Crest Wealth shall endeavor to
 - a) ensure that the investors are provided with true and adequate information without making any misleading or exaggerated claims and are made aware of attendant risks before any investment decision is taken by them;
 - b) render the best possible advice to the client having regard to the client's needs and the environment, and his own professional skills;
 - c) ensure that all professional dealings are effected in a prompt, efficient and cost effective manner.

10. Crest Wealth shall not be a party to
 - a) creation of false market in securities;
 - b) price rigging or manipulation of securities;
 - c) passing of price sensitive information to brokers, members of the stock exchanges and any other intermediaries in the capital market or take any other action which is prejudicial to the interest of the investors.

11. Crest Wealth or any of its directors, partners or manager shall either on their respective accounts or through their associates or family members, relatives enter into any transaction in securities of companies on the basis of unpublished price sensitive information obtained by them during the course of any professional assignment.

12. A portfolio manager or any his employees shall not
 - a) render, directly or indirectly any investment advice about any security in the publicly accessible media, whether real-time or non-real-time, unless a disclosure of his long or short position in the said security has been made, while rendering such advice.
 - b) In case an employee of the portfolio manager is rendering such advice, he shall also disclose the interest of his dependent family members and the employer including their long or short position in the said security, while rendering such advice.

13. a) Crest Wealth shall abide by the Act, and the Rules, Regulations made there under and the Guidelines / Schemes issued by the Board.
 - b) Crest Wealth shall comply with the model code of conduct specified in the SEBI (Prohibition of Insider Trading) Regulations, 1992.
 - c) Crest Wealth shall not use his status as any other registered intermediary to unduly influence the investment