

CODE OF CONDUCT FOR INVESTMENT ADVISER

1. Honesty and fairness

We act honestly, fairly and in the best interests of our clients and in the integrity of the market.

2. Diligence

We act with due skill, care and diligence in the best interests of our clients and shall ensure that our advices are offered after thorough analysis and taking into account available alternatives.

3. Capabilities

We have effectively appropriate resources and procedures which are needed for the efficient performance of our business activities.

4. Information about clients

We seek from 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.

5. Information to our clients

We make adequate disclosures of relevant material information while dealing with our clients.

6. Fair and reasonable charges

An investment adviser advising a client may charge fees, subject to any ceiling as may be specified by the Board, if any. The investment adviser shall ensure that fee charged to the clients is fair and reasonable.

7. Conflicts of interest

We try to avoid conflicts of interest as far as possible and when they cannot be avoided, it shall ensure that appropriate disclosures are made to the clients and that the clients are fairly treated.

8. Compliance

An investment adviser including our representative(s) shall comply with all regulatory requirements applicable to the conduct of our business activities so as to promote the best interests of clients and the integrity of the market.

9. Responsibility of senior management

The senior management of a body corporate which is registered as investment adviser shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures by the body corporate.