

Advisory Guidelines

1. MISSION:

As an Investment Adviser, we are passionate about making a difference to the society and help them enrich through our expertise in capital markets.

2. VISION:

Our vision is to build an exemplary Investment advisory practice that can be trusted and unbiased, that is driven by strong values and ethics, providing outstanding investment solutions. To truly partner with our clients in their investment journey and help them realize their financial goals through long term, conservative and responsible non-speculative financial instruments.

3. VALUES:

All our actions as an investment adviser are governed by 3 core values:

- Being transparent,
- Putting clients first,
- Doing the right thing.

The objective will be to help clients make informed decisions regarding their personal finance and enhance their chances of achieving their financial goals in a disciplined way.

4. CODE OF CONDUCT

a) Honesty and Good Faith

Investment Adviser, its employees and associates shall act honestly and in good faith.

b) Diligence

Investment Adviser, its employees and associates shall act with due skill, care and diligence and shall ensure that the advice is offered after thorough analysis.

c) Conflict of Interest

Investment Adviser, its employees and associates shall effectively address conflict of interest which may affect the impartiality of its advisory shall make appropriate disclosures to address the same.

d) Insider Trading or front running

Investment Adviser, its employees and associates shall not engage in insider trading or front running of our own advice.

e) Confidentiality

Investment Adviser, its employees and associates shall maintain confidentiality of information.

f) Professional Standard

Investment Adviser, its employees and associates engaged in advisory shall observe high



professional standard while offering advice.

g) Compliance

Investment Adviser, its employees and associates shall comply with all regulatory requirements applicable to the conduct of its business activities.

h) Responsibility of senior management

The senior management of Investment Adviser, its employees and associates engaged in advisory shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures by the body corporate.

5. NO FRONT-RUNNING

Front-running is prohibited. There are two ways in which front-running can arise:

- a) Through use of client order information, i.e. utilizing the advantage of advance knowledge of pending orders of clients; or
- b) Through information about the timing or contents of advice prior to offering it to the clients.

We, **Union Capital Advisors Private Limited** ("Investment Advisor"), a registered investment advisor, with SEBI Registration No. INA200014548, are implementing above guidelines as a guiding principle for our investment advisory activities. The guidelines would be applicable to us along with our employees and associates.

For Union Capital Advisors Private Limited,

Authorised Signatory

adha Raiu

