



CODE OF CONDUCT

This Code of conduct (“the Code”) has been adopted by **Pioneer Wealth Management Services Limited**, (“the Company”) and is designed to comply with the sub regulation 9 of Regulation 15, read with Schedule III of Securities and Exchange Board of India (Investment Advisers) Regulation 2013.

This Code establishes rules of conduct for all employees of the Company. It is based upon the principle that the Company and its employees owe a fiduciary duty towards clients of the Company. It is designed to ensure that the high ethical standards maintained by the Company continue to be applied.

The purpose of the Code is to preclude activities which may lead to or give the appearance of conflicts of interest, insider trading and other forms of prohibited or unethical business conduct.

Pursuant to the Investment Advisers Regulation, both the Company and its employees are prohibited from engaging in fraudulent, deceptive or manipulative conduct.

The Employees of the Company is required to comply with the following duties while dealing with its clients:

- To ensure that investment advice is suitable to meeting the client’s individual objectives, needs and circumstances and
- To be loyal to clients.

The Provisions of the code are not all inclusive, rather they are intended as guide for employees of the company for their conduct.

CODE OF CONDUCT OF THE COMPANY ARE AS FOLLOWS:

1. Honesty and fairness

The Company shall act honestly, fairly and in the best interests of its clients and in the integrity of the market.

2. Diligence

The Company shall act with due skill, care and diligence in the best interests of its clients and shall ensure that their advice is offered after thorough analysis and taking into account available alternatives.

3. Capabilities

The Company shall employ effectively appropriate resources and procedures which are needed for the efficient performance of its business activities.

4. Information about clients

The Company shall seek from its 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 its clients

The Company shall make adequate disclosures of relevant material information while dealing with its clients.

6. Fair and reasonable charges

The Company advising a client may charge fees, subject to any ceiling as may be specified by the SEBI. It shall ensure that fees charged to the clients is fair and reasonable.

7. Conflicts of interest

The Company shall 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

The Company, its senior management including its principal officer and persons associated with investment advice shall comply with all regulatory requirements applicable to the conduct of its 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 the Company shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures by the Company.