

CODE OF CONDUCT

1. KRIIS PORTFOLIO PRIVATE LIMITED (“KRIIS”) in the conduct of its business, shall observe high standard of integrity and fairness in all its dealings with its clients and other portfolio managers.
2. The money received by KRIIS 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. KRIIS shall render at all times high standard of service, exercise due diligence and independent professional judgment and ensure proper care. KRIIS would either avoid any conflict of interest in its investment or disinvestment decision or where any conflict of interest arises, ensure fair treatment to all its customers/clients. It shall disclose to the clients, possible source of conflict of duties and interests, while providing unbiased services. KRIIS would not place its interest above those of its clients.
4. KRIIS shall not execute any trade against the interest of the clients in its proprietary account.
5. KRIIS shall not make any statement or indulge in 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 itself, while competing for or executing any assignment.
6. KRIIS 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 its achievements regarding services rendered to other clients.
7. At the time of entering into a contract, KRIIS shall obtain in writing from its client, his/her/its interest in various bodies corporate which enables it to obtain unpublished price sensitive information of the body corporate.
8. KRIIS shall not disclose to any clients or press any confidential information about its client which has come to its knowledge.



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9. KRIIS shall where necessary and in the interest of the client take adequate steps for transfer of the client's securities and for claiming and receiving dividends, interest payments and other rights accruing to the client. KRIIS shall also take necessary action for conversion of securities and subscription for /renunciation of rights in accordance with the clients' instruction.
10. KRIIS 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 it.
 - b) render the best possible advice to the client having regard to the client's needs and the environment and its own professional skills.
 - c) ensure that all professional dealings are effected in a prompt, efficient and cost effective manner.
11. KRIIS 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 recognized stock exchanges and any other intermediaries in the capital market or take any other action which is prejudicial to the interest of the investors.

KRIIS or any of its directors, partners or manager shall not either on their own 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 it/him/her during the course of any professional assignment.

- 12.
- a) KRIIS or any of its employees, shall not 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 its/his/her long or short position in the said security has been made, while rendering such advice.
 - b) In case an employee of KRIIS is rendering such advice, he/she shall also disclose the interest of his/her dependent family members and the employer including their long or short position in the said security, while rendering such advice.



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13.

- a) KRIIS shall abide by the Act, Rules and Regulations made thereunder and the Guidelines/Schemes issued by the Board.
- b) KRIIS shall comply with the code of conduct specified in the SEBI (Prohibition of Insider Trading) Regulations, 2015 as may be amended from time to time.
- c) KRIIS shall not use its status as any other registered intermediary to unduly influence the investment decision of the clients while rendering portfolio management services.