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Code of Conduct

VERSION 1.0

**GLORY PRIME WEALTH
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SCOPE OF CODE OF CONDUCT

The scope of this Corporate Code of Conduct is to provide a framework for ethical decision-making within the business. Our Code of Conduct applies to all our employees regardless of employment agreement, rank, or location. Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties.

The Code of Conduct sets the values and principles that employees **MUST** follow in our interactions with stakeholders such as clients, other business partners and the regulatory authorities. It outlines the internal guidelines for all employees and works as an external statement for corporate values and commitment. In an office setting, a code of conduct can support decision making as it gives a detailed structure to follow. The importance of our Code of Conduct increases as our scope of operations and influence widens. This Code also sets rules that we as a company follow and articulates the kinds of behaviour we expect from our employees and everyone who represents us.

This Code is deemed to ensure that the employees governed by this Code will:

- Maintain appropriate standards of conduct
- Develop those skills necessary for the efficient performance of their duties
- Maintain fairness in decision making
- Maintain and enhance the reputation of the company
- Adhere to appropriate ethical standards

STANDARDS OF CONDUCT

I. Fiduciary Duty & Client Related Obligations

1. Investor's interest is paramount, always act in the best interest of the investor
2. Exercise due diligence, proper care & professional judgement while making any investment recommendation
3. Refrain from guaranteeing or promising returns in any type of scheme.
4. Highlight risk factors of each scheme, abstain from misrepresenting and exaggerating any information
5. Urge investors to go through SAI/SID/KIM before deciding to make investments.
6. To ensure suitability, seek information from investors about their financial status, investment experience and investment objectives.
7. Do not deliberately withhold or omit any material fact or information from any investor that the investor should know, including information about any scheme or transaction not being appropriate for the investor.
8. Do not mis-sell mutual fund products in order to earn higher commissions.
9. Observe high standards of ethics, integrity, and fairness in all dealings with all parties - investors, AMCs, Registrars & Transfer Agents, and other intermediaries.
10. In all matters relevant to investors, make efforts to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.
11. In line with SEBI, AMFI and investment regulations, you shall not use any sensitive information to which you may be privy, for any other purpose, except for Glory Prime Wealth Private Limited official use.

STANDARDS OF CONDUCT

II. Compliance with Laws

1. Comply with the Know Your Distributor (“KYD”) norms prescribed by AMFI

2. Exercise proper care in attesting / certifying investor documents and performing In Person Verification (“IPV”) of investors for the KYC process

3. We operate within the laws and regulations of the country in which we operate and within the framework of our own internal directives and regulations.

4. The purpose is not only to ensure the legality of our actions, but also to do the right thing.

5. Strive to maintain an open, transparent, and cooperative relationship with public authorities and we assume our responsibility as a global player in the financial market.

III. Preserve Confidentiality

1. Maintain confidentiality of all information relating to all investor information, deals & transactions

2. Do not provide confidential or proprietary information to third parties, including business partners and vendors, without appropriate authorization and a valid confidentiality agreement.

3. Do not discuss confidential information in places where you might be overheard.

STANDARDS OF CONDUCT

IV. Infrastructure & Record Keeping

1. Maintain adequate records in relation to all investors, whether in physical or digital form, as applicable
2. Maintain records of correspondence with the investors on scheme or transaction suitability and consent/dissent of the investors.
3. Obtain the consent of the person concerned before externally disclosing any personal information, unless required by law.

V. Privacy

1. Ensure that data is always protected, used only for the purpose for which it was obtained and stored securely.
2. Be careful when using electronic means of storing and sending information.
3. Secure all confidential information when working in work environment. All computers, electronic equipment, electronic data and records, Company issued phones, physical files, lockers, desks, and other furniture are the property of the Company.
4. Make use of secure passwords and other authentication factors. Ensure proper care to ensure the authenticity of e-mail senders, other communication formats, and their content. Furthermore, at GPWPL, we only use licensed software.

STANDARDS OF CONDUCT

VI. Respect for People

This ethical principle covers the conduct of employees in their dealings with others including other employees & external organizations.

Employees are expected to:

1. Treat other employees with courtesy and fairness
2. Be responsive and prompt in all professional dealings
3. When supervising employees, create a fair and just working environment
4. Observe procedural fairness when engaged in decision-making
5. Have respect for cultural differences

VII. Dress Code

1. In order to promote an image that enhances the scope of our corporate reputation, all employees will maintain a standard of grooming and personal presentation that is appropriate for their work environment.
2. It is always required that employees dress neatly and appropriately to maintain a professional image. As representatives of this company, employees must adhere to the dress code policy (Formal Dressing on all weekdays, except festivals)
3. The company urges employees to use sound judgment when it comes to selecting their work attire.

Employees that have direct contact with company clients must follow professional dress code during client visits and meetings.

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VIII. Disciplinary actions that may be taken

1. Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.
2. Possible consequences include:
 - a. Reprimand.
 - b. Suspension or termination for more serious offenses.
 - c. Detraction of benefits for a definite or indefinite time.

IX. Key Rules/Principles of Glory Prime Wealth Private Limited

1. Any change in permanent address, temporary address, communication details should be promptly communicated.
2. Any physical or mental health issue should be mentioned and the organization will take due care to maintain confidentiality.
3. The employee/partner/director/contractual employee/intern, without the prior and formal consent of the company, whether for any consideration or not, should not enter into any association with any third party in the nature of employment, retainership, assignment, consultancy, engagement or in any other manner whatsoever, or carry out any other profession/business/activity nor engage in any such activities (even if it is on part-time basis) as....

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.....would interfere with the performance and delivery of your obligations to this organization or which would represent a conflict of interest to the organization

4. At any time during your employment or after its termination, you shall not divulge, directly or indirectly, any knowledge, information or documents acquired by you in the course of your employment concerning the business or affairs of the company or its associates or clients/customers and which are in the nature of a trade secret or secret in other respects the disclosure of which will cause harm to the company, its associates or clients/customers.

5. The employment may be terminated by the company, without any notice or compensation in lieu of the notice, in any of the following events:

- a. Any act of dishonesty, disobedience, insubordination, irregularity in attendance or any other misconduct, or neglect or non-performance.
- b. Breach or violation on your part, of any terms and conditions, including non-observance by you to the company's ethics and rules.
- c. Misrepresentation of your job responsibilities, misappropriation of funds by you, or any act done which is against the policies of the company (Damages may be recovered)

6. Employee should not have any investment/insurance or any other financial product license...

STANDARDS OF CONDUCT

.... in her name or her family members/relative's name. If there is any existing license or if the employee comes to know of any such license in relatives, it is the duty of employee to inform immediately.

7. Employee cannot indulge in similar business practice for at least 2 years after leaving the organization.

8. Employee can not engage in trading/speculating activities. Employee is required to submit Demat and trading account statements for self and family members as and when requested.