

CODE OF CONDUCT POLICY

(FOR REGISTERED INVESTMENT ADVISER – SEBI COMPLIANT)

Introduction:

This Code of Conduct Policy (“the Policy”) is framed in accordance with the **Securities and Exchange Board of India (Investment Advisers) Regulations, 2013**, as amended from time to time, and the **SEBI Master Circular for Investment Advisers (June 27, 2025)**.

The objective of this Policy is to lay down the standards of professional conduct, integrity, and ethical behavior to be followed by **Finideas Advisors Private Limited**, a SEBI-registered Investment Advisor and all its representatives, in their dealings with clients and other stakeholders.

As a SEBI-registered Investment Adviser, **Finideas Advisors Private Limited**, is bound by a fiduciary duty to act in the **best interests of its clients**, provide fair and unbiased advice, and uphold the integrity of the securities market. This Policy seeks to:

- Establish a clear framework for conduct that ensures **honesty, fairness, transparency, and accountability** in all advisory activities.
- Protect the interests of clients through appropriate disclosures, conflict management, and grievance redressal mechanisms.
- Ensure compliance with the applicable **laws, regulations, circulars, and guidelines** issued by SEBI and other competent authorities.
- Promote a culture of **professional competence, due diligence, and ethical decision-making** within the organization.

This Policy shall apply to the **Principal Officer, Compliance Officer, Partners/Directors, Persons Associated with Investment Advice (PAIA), employees, and any other authorized representatives** of **Finideas Advisors Private Limited**.

All stakeholders covered under this Policy are expected to understand, comply with, and uphold the principles enshrined herein, both in letter and spirit. Any violation of this Policy shall be treated as a breach of regulatory obligations and may invite disciplinary action as per SEBI’s framework.

Code of Conduct Policy for RIAs

1. Integrity, Honesty, and Fairness

- Act honestly, fairly, and in the best interests of clients and market integrity
- Avoid misleading claims, advertisements, or assurances of guaranteed returns

2. Diligence & Competence

- Exercise due skill, care, and diligence while providing advice
- Ensure advice is given after proper analysis and comparison of alternatives.
- Employ qualified and certified personnel only

3. Client-Centricity & Fiduciary Duty

- Always act in a fiduciary capacity towards clients
- Conduct proper risk profiling and suitability assessments (with client consent) before giving advice
- Treat all clients fairly; do not discriminate between clients opting for similar services

4. Transparency & Disclosures

- Disclose all conflicts of interest clearly, and avoid them where possible
- Provide material information, risks, obligations, and costs relevant to the advice
- Ensure website disclosures: registration details, contact info, complaint status, and regulatory office details

5. Confidentiality

- Maintain **confidentiality of client information**; share only with client consent or as required by law

6. Fees & Charges

- Charge **fair and reasonable fees** only via traceable banking channels (no cash)
- Provide clear **fee structure, billing details, and illustrations** in client agreements

7. Conflict of Interest Management

- Maintain **arms-length segregation** between advisory and other activities (distribution, execution, etc.)
- Avoid deriving benefit from clients' transactions.

FINIDEAS INVESTMENT ADVISOR PRIVATE LIMITED

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8. Record Keeping & Documentation

- Maintain records: KYC, risk assessment, rationale for advice, client agreements, fee records
- Preserve records for minimum **5 years**.

9. Compliance & Audit

- Conduct **annual compliance audits**; publish status and adverse findings with corrective action
- Appoint a **compliance officer** (for non-individual RIAs)

10. Client Grievance Redressal

- Establish effective grievance redressal within **21 calendar days**
- Provide clear access to SEBI SCORES and other dispute resolution mechanisms.

11. Prohibited Practices

- No free trials or part payments
- No assured returns or misleading performance claims
- No power of attorney or fund/securities management on behalf of clients
- No own-account trades contrary to client advice **within 15 days**