

MODERN SHARES AND STOCKBROKERS LTD

CODE OF CONDUCT FOR EMPLOYEES OF MODERN SHARES AND STOCKBROKERS LTD

1. Consider investor's interest as paramount and take necessary steps to ensure that the investor's interest is protected in all circumstances.
2. Adhere to SEBI Stockbrokers *and sub-brokers* Regulations and guidelines issued from time to time.
3. Highlight risk factors and urge investors to go through the RDD before deciding to make investments.
4. Disclose to the investors all material information including the brokerage.
5. Abstain from indicating or assuring returns in any way.
6. Maintain high service standards to clients/ investors, and ensure that critical operations such as forwarding copies of KYCs, cheques and despatch of statement of account and to clients/ investors are done within the time frame prescribed.
7. Do not collude with investors in faulty business practices such as bouncing of cheques, wrong claiming of dividend, etc.
8. Abstain from making negative statements about the Company and ensure that comparisons, if any, are made with similar and comparable products along with complete facts.
9. Maintain confidentiality of all client/ investor details, deals and transactions.

10. Keep client's / investor's interest and suitability to their financial needs as paramount. Do not offer commission to clients/ investors and abstain from attracting investors through temptation of rebate/gifts etc.
11. Do not accept or be beneficiary of any commission/ incentives of any nature, directly or indirectly.
12. To protect the clients/ investors from potential fraudulent activities, take reasonable steps to ensure that the client's/ investor's address and contact details filled in the KYC form are investor's own details, and not of any third party. Where the required information is not available in the application form, make reasonable efforts to obtain accurate and updated information from the client/ investor and abstain from filling wrong / incorrect information or information of their own or of their employees, officials as the investor's address and contact details in the KYC form, even if requested by the investor to do so. Also abstain from tampering in any way with the KYC form submitted by the investor, including inserting, deleting or modifying any information in the KYC form provided by the client/ investor.
13. Provide all documents of clients/ investors in terms of the Anti Money Laundering / Combating Financing of Terrorism requirements, including KYC documents / Power of Attorney, etc.
14. Be diligent in attesting / certifying client/ investor documents and performing In Person Verification (IPV) of investor's for the KYC process in accordance with the guidelines prescribed by KYC Registration Agency (KRA) from time to time.
15. Observe high standards of ethics, integrity and fairness in all dealings with all parties – clients/ investors, Mutual Funds/ AMCs, Registrars & Transfer Agents and other intermediaries. Render at all times high standards of service, exercise due diligence, and ensure proper care.
16. Adhere to the criteria specified by SEBI for due diligence exercise, and maintain the requisite documentation while executing KYC documents of the clients/ investors.
17. Do not indulge in fraudulent or unfair trade practices of any kind while purchasing/selling shares/any other product of the Company, directly or indirectly by making false or misleading statement, concealing or omitting material facts of the product, concealing the associated risk factors of the product or not taking reasonable care to ensure suitability of the product to the investor. Any violation to this will be construed as fraudulent / unfair trade practice.

Compliance Officer