

CHINMAY KELKAR, CFA

SEBI REGISTERED INVESTMENT ADVISOR (REGISTRATION NUMBER - INA000006837)

552, PUNARNAVA APARTMENTS, OLD RAMDASPETH, NAGPUR - 440010

CONTACT NUMBER: +91 96195 73740 / +91 712 2422327

EMAIL: CHINMAYK@GMAIL.COM | CHINMAY@KOSHERADVISORY.COM

CODE OF CONDUCT POLICY

1. **MISSION:** As an Investment Adviser, I am passionate about making a difference to the society and help them enrich through our expertise in capital markets.
2. **VISION:** My vision is to build an exemplary Investment advisory practice that can be trusted and unbiased, that is driven by strong values and ethics, providing outstanding investment solutions. To truly partner with our clients in their investment journey and help them realize their financial goals through long term, conservative and responsible non-speculative financial instruments.
3. **VALUES:** All my actions as an Investment Adviser are governed by 3 core values:
 - a. Being transparent,
 - b. Putting clients first,
 - c. Doing the right thing.

The objective will be to help clients make informed decisions regarding their personal finance and enhance their chances of achieving their financial goals in a disciplined way.

4. CODE OF CONDUCT

- a. **Honesty and Good Faith:** Investment Adviser shall act honestly and in good faith.
- b. **Diligence :** Investment Adviser shall act with due skill, care and diligence and shall ensure that the advice is offered after thorough analysis.
- c. **Conflict of Interest:** Investment Adviser shall effectively address conflict of interest which may affect the impartiality of its advisory shall make appropriate disclosures to address the same.
- d. **Insider Trading or front running:** Investment Adviser shall not engage in insider trading or front running of its own advice.
- e. **Confidentiality:** Investment Adviser shall maintain confidentiality of information.
- f. **Professional Standard:** Investment Adviser engaged in advisory shall observe high professional standard while offering advice.
- g. **Compliance:** Investment Adviser shall comply with all regulatory requirements applicable to the conduct of its business activities.

5. **NO FRONT-RUNNING:** Front-running is prohibited. There are two ways in which front-running can arise:
 - a. Through use of client order information, i.e. utilizing the advantage of advance knowledge of pending orders of clients; or
 - b. Through information about the timing or contents of advice prior to offering it to the clients.



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I am a registered investment advisor, with SEBI Registration No. INA000006837, and am implementing below guidelines as a guiding principle for my investment advisory activities.



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Chinmay Kelkar, CFA

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BSE Membership ID: 1041

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License Details: Issue Date - January 2017; Valid Till - Perpetual

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