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CODE OF CONDUCT

Statement of General Policy

This Code of Ethics ("Code") has been adopted by **Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited)** and is designed to comply with the Securities and Exchange Board of India (Investment Advisers) Regulations, 2013 [sub- regulation (9) of regulation 15].

This Code establishes rules of conduct for all employees of **Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited)** and is designed to, among other things, to govern personal securities trading activities in the accounts of employees, immediate family/household accounts, and accounts in which an employee has a beneficial interest. The Code is based upon the principle that Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) and its employees owe a fiduciary duty to Epsilon Money Investment Management Private Limited's (Formerly known as Multi Ark Wealth Private Limited) clients to conduct their affairs, including their personal securities transactions, in such a manner as to avoid (i) serving their own personal interests ahead of clients, (ii) taking inappropriate advantage of their position with the firm, and (iii) any actual or potential conflicts of interest or any abuse of their position of trust and responsibility.

The Code is designed to ensure that the high ethical standards long maintained by Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) continue to be applied. The purpose of the Code is to preclude activities that may lead to or give the appearance of conflicts of interest, insider trading, or other forms of prohibited or unethical business conduct. The excellent reputation of our firm continues to be a direct reflection of the conduct of each employee.

Pursuant to the Investment Advisers Regulation, both Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) and its employees are prohibited from engaging in fraudulent, deceptive, or manipulative conduct. Compliance with this section involves more than acting with honesty and good faith alone. It means that Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) has an affirmative duty of utmost good faith to act solely in the best interest of its clients.

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Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) and its employees are subject to the following specific fiduciary obligations when dealing with clients:

- It is a duty to have a reasonable, independent basis for the investment advice provided.
- The duty to ensure that investment advice is suitable for meeting the client's individual objectives, needs, and circumstances; and
- A duty to be loyal to clients.

In meeting its fiduciary responsibilities to its clients, Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) expects every employee to demonstrate the highest standards of ethical conduct for continued employment with Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited). Strict compliance with the provisions of the Code shall be considered a basic condition of employment with Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited). Epsilon Money Investment Management Private Limited's (Formerly known as Multi Ark Wealth Private Limited) reputation for fair and honest dealings with its clients has taken considerable time to build. Employees are urged to seek the advice of Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited), the investment advisor, for any questions about the Code or the application of the Code to their individual circumstances. Employees should also understand that a material breach of the provisions of the Code may constitute grounds for disciplinary action, including termination of employment with Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited).

The provisions of the Code are not all-inclusive. Rather, they are intended as a guide for employees of Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) in their conduct. In those situations where an employee may be uncertain as to th intent or purpose of the Code, he/she is advised to consult with Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited), Epsilon Money Investment Management Private Limited (Formerly known as Multi Ark Wealth Private Limited) may grant exceptions to certain provisions contained in the Code only in those situations when it is clear beyond dispute that the interests of our clients will not be adversely affected or compromised.

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Code of Conduct for Investment Advisor

1. Honesty and fairness

An investment adviser shall act honestly, fairly, and in the best interests of its clients and in the integrity of the market.

2. Diligence

An investment adviser shall act with due skill, care, and diligence in the best interests of its clients and shall ensure that its advice is offered after thorough analysis and considering available alternatives.

3. Capabilities

An investment adviser shall have and effectively employ appropriate resources and procedures that are needed for the efficient performance of its business activities.

4. Information about clients

An investment adviser shall seek from its clients, information about their financial situation, investment experience, and investment objectives relevant to the services provided and maintain confidentiality of such information.

5. Information for its clients

An investment adviser shall make adequate disclosures of relevant material information while dealing with its clients.

6. Fair and reasonable charges

An investment adviser advising a client may charge fees, subject to any ceiling that may be specified by the board, if any. The investment adviser should ensure that fees charged to the clients are fair and reasonable.

7. Conflicts of interest

An investment adviser should try to avoid conflicts of interest as far as possible, and when they cannot be avoided, it should ensure that appropriate disclosures are made to the clients and that the clients are fairly treated.

8. Compliance

An investment adviser, including its representative(s), shall comply with all regulatory requirements applicable to the conduct of its business activities to promote the best interests of clients and the integrity of the market.

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9. Responsibility of management

The management of a proprietorship firm that is registered as an investment adviser shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures by the firm.

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For Epsilon Money Investment Management Private Limited
(Formerly known as Multi Ark Wealth Private Limited)

Mr. Siddharth Alok
Principal Officer