

CODE OF CONDUCT POLICY

The following Code of Conduct Policy Statement is prepared by UpperCrust Wealth Pvt. Ltd. and effected from **15th September 2021**.

At UpperCrust Wealth Pvt. Ltd., we have outlined our Code of Conduct pertaining to Employees especially their behavior towards their seniors, colleagues, and overall organization. We treat our employees as our stakeholders and promote openness amongst them so that there has to be flow-less communication in the organization. We expect that all our employees be it juniors or seniors strictly follow our code of conduct policy. As professional organization, we are not inclined to treat unnecessary disputes and we avoid offending at our workplace. Besides this, we have outlined our code of conduct towards corporate perspectives that each of our employees have to follow while engaging with clients.

EMPLOYEE CODE OF CONDUCT

All the employees at UpperCrust Wealth Pvt. Ltd. must be bound to follow our code of conduct policy while performing their duties. We express the components of our Code of Conduct as follows:

Law & Compliance

All employees must oblige the policy by protecting the company's legal and compliance. Besides this, they must comply with Environmental, Social, and Governance matters.

Ethics

All employees must be responsible to deal with any transactions prevailing operational or financial whether it regards to company's finance, partnership in an ethical manner.

Empathy at the Workplace

All employees must respect their colleagues be it they are junior or senior level cadre. We at UpperCrust, will not entertain any sorts of discriminatory behavior or anomalies, or victimization-related activities. All employees must hold a holistic approach when it comes to assist and guide their subordinates.

Protecting Company's Assets

All employees must protect all the assets of the company be it tangible, or intangible. They must treat them with due care, and should not trifle them at all. The employees at UpperCrust should not divulge any information, reports prepared by the company and must consider them as a valuable asset. The company may take an action to the extent that it found any employee involved in damaging or vandalizing assets herein mentioned in this para.

Professionalism

All employees must follow values namely professionalism, integrity at the workplace in a manner as follows:

1. All employees must be formal when they are at the workplace, or meeting with clients.
2. We either discourage our employees or not to get involved with any such activities that cause corruption or bribery-related matter. We are an ethical organization and promote fairness in any transaction that we entertain.
3. We expect that all our employees fulfill their duties with best practices. Besides this, we expect all seniors to allocate tasks properly to their subordinates and juniors and also conduct a performance evaluation system on a periodic basis.
4. We organize mentorship programs and certain motivation lectures that increase the productivity and confidence amongst our employees thereby creating a professional like culture.
5. We expect all employees to refrain from all those activities that affect their performance like unnecessary involvement in non-value-adding activities, hours, etc.
6. We believe that time is precious and so, we don't expect our employees to take their lives granted unnecessary until the valid reasons in place.
7. We expect that all our employees to discourage all those conflicts of interest emanating from either personal, financial, or other whatsoever matter, and resolve them at the earliest.
8. We expect that none of our employees utilize benefits offered by the company for their own or personal use.
9. Any forms of violence or harassment at the workplace including physical, verbal, sexual, or psychological abuse are strictly prohibited, and the company may take serious action against an employee if found dealing with this circumstances.
10. We provide complete protection against Whistle Blower if and when done by any employee in the form of complaint, reporting or participating in assisting an investigation when arises.

We believe in flow-less communication at our workplace, and so we provide liberty and freedom to all employees to provide their suggestions, recommendations that we actively evaluate and apply to our organization if we find them valuable.

All employees must read, apply and follow the guidelines conceptualized by our Human Resource Department.

Our company may take disciplinary action against any employees (be it of any cadre) if they are failing to follow the aforesaid code of conduct policy.

We undertake complete policy review at certain intervals as part of our best governance practices at our company.

CORPORATE CODE OF CONDUCT

All employees at UpperCrust Wealth Pvt. Ltd. must follow professionalism when it comes to interacting with clients. We strictly adhere to follow the policy framework on client perspective especially we initiate our engagement with our clients. We believe that our clients are our valuable assets likewise our employees, and so we deal with them professionally.

Formulation of Strategy

Once we are mandated and sign the agreement with clients to initiate an assignment, we formulate the plan as to how client's resources are utilized to offer the best of return while mitigating volatility. We discuss with clients the entire strategic map from the scratch to the final outcome.

Timely Deliverable

We believe that time is money and so the task for which we are mandated, timely execution, and deliverable are the caterpillar to success. We deliver the outcome in a timely manner before the deadline is over.

Communication

We hold a constant communication approach with clients to extract the data, resources required to create a plan, model. We communicate with clients the entire scenario as to how we are going to manage their finance. We discuss all facets of plans that we create until it reaches outcome. The entire process-led strategy is designed where communication is believed to be a powerful tool.

Confidentiality

We strictly follow the confidentiality principle to ensure the privacy of data, resources that clients share with us. Privacy is a major concern for us while we interact with our clients.

Risk Management

We are in the business where we require certain tools to ensure the success of the outcome. This is where we apply best risk management practices to ward off anomalies. We have a team of experts who use a variety of tools both – quantitative as well as qualitative to evaluate various assets classes.

Trust and Respect

In our business, trust, and respect are two major values that help us win the interest of our clients thereby creating a long term relationship with them.

Performance Evaluation

We have an expert committee to evaluate as to how we manage clients' resources. Subsequently, we communicate our performance review with our clients. We conduct variance analysis and assign them to the respective authority in order to take corrective action.

Audit & Reporting

We have an audit committee to evaluate the performance of assets/resources that we manage on behalf of our clients. Post audit review, we report to clients to analyze the performance of their assets.

Finishing Contract

Upon finishing contracts with clients, our performance broadly communicate as to how we have maximized the return thereby creating value.

Our guiding principles at UpperCrust Wealth Pvt. Ltd. help us create a long success story internally as well as externally.

For any queries related to the aforesaid policy statement, please feel free to contact **Shaily Pandya** at **mail@uppercrustwealth.com**