



Arya One Global IFSC LLP

Code of Conduct Policy

1. Objective

This Code of Conduct is established in accordance with the IFSCA (Fund Management) Regulations, 2025. It aims to ensure that Arya One Global IFSC LLP ("FME"), including its key management personnel, directors, employees, trustees, and associated persons, operate with integrity, professionalism, and in the best interests of investors at all times.

2. Applicability

This Code applies to:

- Arya One Global IFSC LLP
- Designated Partners, Trustees
- Key Management Personnel, employees, and officers
- Associated persons involved in fund operations and client interactions

3. Core Principles

a) Integrity & Fairness

- Act honestly and fairly with all stakeholders.
- Avoid any act or omission likely to mislead an investor or stakeholder.

b) Diligence & Professionalism

- Maintain high standards of due diligence, competence, skill, and market conduct.
- Exercise sound judgment and prudence in all actions.

4. Fiduciary Responsibility

- Prioritize investor interests over personal or firm gain.
- Act with loyalty, care, and in the best interest of all investors.
- Maintain written documentation for all investment decisions with justification.
- Manage conflicts of interest fairly and transparently.

5. Confidentiality

- Safeguard all proprietary and investor information.
- Use confidential data strictly for intended business purposes only not for any personal gain .

6. Legal and Regulatory Compliance

Adhere to the Code of Conduct outlined in Schedule II of the IFSCA (Fund Management) Regulations, 2025, which includes the following key obligations:

A. Fund Management Entity (FME)

- Must ensure investments comply with regulations and act in investors' best interests.
- Liable for acts of employees or outsourced personnel.
- Leadership (CEO, Directors) remains accountable despite contracts or resignation.
- CEO responsible for compliance, investor interest, and risk management.
- Cannot appoint key personnel with a history of financial or securities violations.
- Must value investments as per prescribed norms and publish them.
- Must compensate investors for losses due to unfair valuations.
- Disclose all relevant, clear, and timely information about the schemes.
- Ensure full segregation (ring-fencing) of assets, liabilities, and accounts of each scheme.
- Avoid unethical marketing or mis-selling of products.
- Maintain fairness, integrity, due diligence, and professional conduct.
- Avoid exaggerated claims about their services or achievements.
- Ensure compliance with AML/CFT regulations.

B. Fiduciaries (Directors / Partners / Trustees)

- Ensure investments align with scheme objectives and investor interests.
- Maintain segregation of schemes and avoid conflict between activities.
- Access relevant information from FME and hold regular review meetings.
- Monitor and correct deficiencies in the FME's operations.
- Before launching schemes, ensure systems, personnel, auditors, compliance officer, and exchange approvals are in place.

- Avoid preferential treatment to associates and review related-party transactions quarterly.
- Review FME's net worth annually and safeguard fund property.

C. Principal Officer, Compliance Officer

- Ensure full regulatory compliance and investment alignment with scheme goals.
- Act promptly if any violation occurs and inform the Authority.
- Resolve investor complaints swiftly.
- Uphold integrity, fairness, and transparency in market conduct.
- Avoid unethical or dishonest practices; manage conflicts of interest.
- No gifts or inducements beyond FME's approved policy.
- Compliance Officer must monitor compliance and report breaches independently.

D. Conflict of Interest

- FMEs must act in a fiduciary capacity and disclose conflicts of interest.
- Must maintain written policies to manage and avoid conflicts.
- Activities must be conducted at arm's length to avoid investor harm.
- Fully cooperate with regulatory authorities and audits.

7. Insider Trading and Personal Conduct

- Do not trade based on unpublished price-sensitive information (UPSI).
- Pre-clear personal trades, avoid short-term and blackout period trading.
- No acceptance or offering of gifts or entertainment beyond the firm's policy.

8. Governance and Oversight

- Independent oversight through Designated Partners
- Annual competency review of directors and key persons.

9. Risk Management

- Link code conduct with risk and business continuity framework.

10. Training and Monitoring

- Annual training and certifications required for all employees and KMP.
- Compliance Officer shall monitor, audit, and report breaches independently.

11. Enforcement and Disciplinary Action

- Violations may result in disciplinary action, including warnings or termination.
- Significant breaches will be reported to IFSCA as per regulations.

12. Review and Amendments

- This Code shall be reviewed annually.
- Revisions must be approved by the Designated Partners and communicated to all stakeholders.

Approved By:

Governing Body

Effective Date: April 1, 2025

Review Cycle: Annual / As required