

KLM Investing School – Code of Conduct for Research Analyst

	CODE OF CONDUCT FOR RESEARCH ANALYST
1	Honesty and Good Faith
	Research analyst or research entity shall act honestly and in good faith
2	Diligence
	Research analyst or research entity shall act with due skill, care and diligence and shall ensure that the research report is prepared after thorough analysis.
3	Conflict of Interest
	Research analyst or research entity shall effectively address conflict of interest which may affect the impartiality of its research analysis and research report and shall make appropriate disclosures to address the same.
4	Insider Trading or front running
	Research analyst or research entity or its employees shall not engage in insider trading or front running or front running of its own research report.
5	Confidentiality
	Research analyst or research entity or its employees shall maintain confidentiality of report till the report is made public.
6	Professional Standard
	Research analyst or research entity or its employees engaged in research analysis shall observe high professional standard while preparing research report.
7	Compliance
	Research analyst or research entity shall comply with all regulatory requirements applicable to the conduct of its business activities
8	Responsibility of senior management
	The senior management of research analyst or research entity shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures