

WINVEST CAPITALS

Address – 401-A 4TH Floor, Gurudatta Plaza,
Beside HP Petrol pump, Ganesh Colony Road, Jalgaon,
Jalgaon (M Corp.), Jalgaon- 425001

Email Id: winvestcapitals25@gmail.com Phone Number: +919579557272

CODE OF CONDUCT FOR RESEARCH ANALYST

(Formulated under Regulation 15(1) and the Third Schedule of SEBI (Research Analysts) Regulations, 2014)

1. Honesty and Fairness

- I will act with high standards of integrity, honesty, and fairness in conducting my research operations.
- I will ensure all investment recommendations are made fairly and without bias to all subscribers.

2. Diligence and High Professional Standards

- I will execute all research activities with due skill, care, diligence, and professional independence.
- I will maintain professional standards and ensure all recommendations have a solid, verifiable basis.

3. Basis for Recommendation

- I will ensure that any research report, trading call, or model portfolio modification has reasonable and factual backing.
- I will maintain proper records supporting the rationale of all issued recommendations for SEBI inspections.

4. Avoidance of Conflict of Interest

- I will avoid any conflict of interest in my research activities.
- If an unavoidable conflict arises, I will ensure fair treatment to clients through timely, explicit disclosures.
- I will never place my personal financial interests above those of my clients or subscribers.

5. Information Barrier (Wherever Applicable)

- I will keep consumer and research data secure to prevent unauthorized access or information leaks.
- I will not share unpublished price-sensitive information (UPSI) with any external parties.

6. Professional Responsibilities & Disclosures

- I will make complete, accurate, and conspicuous disclosures regarding my holdings and financial interests in all reports.
- I will not distort or misrepresent facts, nor will I publish any statement that is misleading or false.

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- I will cooperate fully with SEBI and all other regulatory authorities during audits or information requests.

7. Compliance with the Regulatory Framework

- I will remain continuously updated and comply with all rules, circulars, guidelines, and regulations issued by SEBI.

Date: 01-04-2026

Place: Jalgaon

SHOEB ABDUL RAHIM SHAIKH

PROPRIETOR OF WINVEST CAPITALS

Proprietor & SEBI Registered Research Analyst