

Code of Conduct and Ethics Policy

1. Purpose

This Code of Conduct and Ethics Policy (“the Code”) sets forth the ethical standards, professional principles, and legal obligations that govern the conduct of all personnel at Bellora Wealth Management (“the Company”). It is designed to promote honest and ethical behavior, ensure compliance with all applicable laws and regulations, and protect the reputation and interests of the Company, its clients, and its stakeholders.

2. Scope

This Code applies to:

- All employees, officers, directors, and board members;
- Independent contractors, consultants, and interns;
- Any third parties representing or acting on behalf of the Company.

All individuals covered by this Code are expected to uphold the highest standards of ethical and professional conduct at all times.

3. Core Principles

The Company is committed to the following core principles:

- **Integrity:** Acting with honesty, fairness, and transparency in all business dealings.
- **Accountability:** Taking responsibility for one's actions and decisions.
- **Compliance:** Adhering to all applicable laws, regulations, and internal policies.
- **Respect:** Fostering a respectful, inclusive, and safe work environment.
- **Confidentiality:** Protecting sensitive information from unauthorized disclosure.

- **Professionalism:** Maintaining the highest standard of conduct, diligence, and objectivity in all engagements.
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4. Legal and Regulatory Compliance

All personnel must comply with all applicable local, national, and international laws and regulations. This includes, but is not limited to:

- Anti-bribery and anti-corruption laws;
- Anti-money laundering (AML) regulations;
- Data protection and privacy legislation (e.g., UK GDPR);
- Employment and non-discrimination laws;
- Health and safety standards.

Any actual or suspected legal or regulatory breach must be reported immediately to the Compliance Officer.

5. Conflicts of Interest

Employees must avoid any activity, interest, or association that may compromise their objectivity or interfere with their responsibilities to the Company. Conflicts of interest, whether real or perceived, must be disclosed promptly to management.

Examples include:

- Personal relationships with clients or suppliers that affect impartiality;
 - Outside employment or business interests that conflict with the Company's operations;
 - Receiving gifts or favors that could influence decision-making.
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6. Confidentiality and Data Protection

All employees are required to safeguard the confidentiality of Company, client, and third-party information acquired during the course of their duties. No confidential or proprietary information may be disclosed without proper authorization unless required by law.

Compliance with data protection laws is mandatory. This includes the secure handling, storage, processing, and transmission of personal and sensitive data.

7. Fair Dealing and Anti-Discrimination

The Company is committed to fair and ethical treatment of all individuals. Discrimination, harassment, or retaliation of any kind will not be tolerated.

All decisions regarding recruitment, compensation, promotion, and termination shall be based solely on merit, qualifications, and business needs, without regard to race, gender, age, religion, sexual orientation, disability, or any other protected characteristic.

8. Use of Company Resources

Company resources, including time, materials, systems, and intellectual property, must be used responsibly and only for legitimate business purposes. Unauthorized use, misappropriation, or destruction of Company assets is strictly prohibited.

9. Insider Trading and Market Conduct

Employees in possession of material, non-public information regarding clients or business partners must not use such information for personal gain or disclose it to others. Insider trading is strictly prohibited and is a criminal offense.

10. Environmental and Social Responsibility

The Company is committed to sustainable practices and the responsible use of resources. Employees are encouraged to contribute positively to environmental and social initiatives and to act in a manner that supports the broader interests of society and the communities in which we operate.

11. Whistleblowing and Reporting Violations

Employees are encouraged to report any known or suspected violations of this Code or applicable laws. Reports may be made to:

- Immediate supervisor or line manager;
- Compliance Officer;
- Email: support@bellora-wealth.com

All reports will be handled with confidentiality, and individuals making good faith disclosures will be protected from retaliation.

12. Enforcement and Disciplinary Action

Violations of this Code may result in disciplinary action, up to and including termination of employment, legal action, and/or referral to regulatory authorities. The Company reserves the right to investigate any alleged misconduct fully and fairly.

13. Acknowledgment and Certification

All employees and third parties subject to this Code must acknowledge in writing that they have received, read, understood, and agreed to comply with it.