



Code of Conduct & Ethics

This Code of Conduct and Ethics is a statement of the Company's commitment to integrity and the highest standards of ethical practices. It defines the standards of conduct that is expected of all employees in order that the right decisions are taken in performing their roles and responsibilities across various functions in the Company.

It is responsibility of all employees to fully read this Policy in order to remain aware at all times of the procedures, regulations and other requirements that are relevant or pertinent to each one's business or function.

Application of the Code

The Code and other related policies cannot anticipate every issue in granular detail. Answers to questions involving ethical considerations are often neither easy nor clear-cut. You should understand and abide by both the spirit and the letter of the policies and standards in the Code. Some key aspects that you should keep in mind are:

- Ensure that you have all the facts.
- Where there is shared responsibility, discuss the issue with the other colleagues involved.

A basic responsibility is to discuss the problem with your supervisor.

However, in case you are uncomfortable discussing the matter with your immediate supervisor, discuss it with your Department Head, Branch Head or the HR Officer. In case of an issue that appears ambiguous, ask yourself if your action is consistent with the Code or other policies.

Raising Concerns and Reporting Violations

Inappropriate, wrongful or unethical behavior by any employee, supervisor, customer, supplier or other third-party can significantly compromise the reputation of the Company. Such issues must, therefore, be reported immediately. It is your responsibility, therefore, to report concerns or questions relating to unethical behavior, malpractices or apparent violations of law and regulation that you perceive in your workplace. If such behavior appears to be in conflict with this Code, you must promptly inform the officials or entities.

No action will be taken against anyone for reporting ethical violations in good faith, or participating or assisting in the investigation of a suspected violation of the Code of Conduct. Any act of retaliation against a person who reports such transgressions, malpractices etc. would tantamount to a violation of the Code of Conduct and Ethics of the Company.

Ethical Code and Principles

The Code of Conduct & Ethics also sets out ethical code, principles and addresses the key issues/ethical dilemma that employees are likely to meet in the course of their duties. Employees are trusted to use good judgment in their day-to-day activities and to seek further information or assistance when they need it.

The Code of Conduct & Ethics applies to all employees, including the Senior Management of the Company.

All the stakeholders of the Company are required to comply with all necessary and mandated Statutory as well as regulatory guidelines, (including labor laws, EPF/ESIC declaration, Child Labor Prohibition and Abolition Act, etc.) Sexual Harassment of Women at Work place (Prevention, Prohibition and Redressal) Act 2013 etc. Vendors specifically, are required to comply with all approvals/ licenses/ permissions under the Contract Labor (Regulation and Abolition) Act, 1970, applicable and all applicable central, state and local bye laws, ordinances, regulations and codes in performing its obligations including the procurement of licenses, permits, certificates and payment of taxes wherever required. The Service Provider shall provide as and when demanded a certificate from its external CA certifying that he/ she had complied with statutory compliances, labor regulations and requirements including payment of challans for tax payments i.e., Provident Fund, other statutory dues, etc.

All stakeholders of the Company are required to comply with all of the applicable laws, rules and regulations of India and other countries, and the states, counties, cities and other jurisdictions, in which the Company conducts its business. Local laws may in some instances be less restrictive than the principles set forth in this Code. In those situations, stakeholders should comply with the Code, even if the conduct would otherwise be legal under applicable local laws. On the other hand, if local laws are more restrictive than the Code, stakeholders should comply with applicable local laws. Further, any provision of this Code that is contrary to law in a particular jurisdiction will have no force or effect in that jurisdiction solely with respect to such provision(s), although this Code (including any such provision) will remain applicable in all other jurisdictions.

Ethical Code:

- We abide by the Company's code of conduct & ethics.
- We are just & fair in our dealings
- We protect the Company's interest
- We are transparent in our communications.
- We safeguard information.
- We conduct ourselves professionally and responsibly
- We are respectful in our dealings with one another
- We respect laws and regulations.
- We value our communities.



Ethical Principles

Integrity & Honesty: Acting with integrity and honesty means that one should be ethical, sincere and transparent in all our transactions. As employees of the Company, we should keep our commitments. We should speak up when uncomfortable or uncertain, especially if it comes to actions and behaviours that contradict our organization's core values and culture.

Compliance with laws and regulation: It is our fundamental duty to comply with regulatory guidelines and laws of the land.

Confidentiality: Company's confidential information is a valuable asset and every employee, vendor and stakeholder of the Company must protect it. We must comply with all policies and guidelines relating to security and privacy of confidential information.

Conflict of Interest: All employees are required to maintain the highest levels of professional and personal integrity to avoid situations of conflict, in the interest of the Company.

Anti-bribery & Anti-corruption: We have zero tolerance towards anything of value that may be seen as an attempt to influence an action or a decision in our dealings with the various entities. This could include money, gifts, favors, entertainment etc. Any actions relating to bribery, kickbacks, improper payments should not be entertained.

Gifts & Entertainment: As an organization, we have an ethical Gifts Policy and all employees are required to strictly follow the guidelines of the 'Business Gift Policy' of the Company.

Fair Dealing and responsibilities to customers: We must deal fairly with the Company's customers, vendors, service providers, stakeholders and others with whom we interact while at work. We should refrain from taking undue advantage by manipulating/ concealing/ misrepresenting facts, misusing confidential information or any other unfair practices.

Trust & Reputation: Trust is the foundation of Company. Through trust we add value to our customers. Any unethical act compromises this trust and brings down the reputation. Each individual unethical act is against the institution and is against all of us. As an employee, guarding reputation of the Company should be our prime focus.

Saying No: Having a strong relationship with our customers also means having the ability to say no, especially when in doubt about individuals who are using the financial systems for their non-compliant transactions.

Citizenship: One must continue to nurture Company with honor. Guarding ethos of Company also means our important role in reporting any act of misdemeanor observed.

Doing right at all times: Finally, one must understand that no business or customer is more important than our responsibility to do right at all times.



Privacy & Confidentiality Obligations

Privacy of Employee Information

Safeguarding of personal and confidential information relating to an employee should be strictly exercised. The Company maintains appropriate safeguards to respect the personal privacy of staff members and protect the confidentiality of personal information about them. Employee-related information should not be shared or discussed with any external agencies or employees, except where internally authorized or required by applicable law, regulation, jurisdiction, administrative or legislative body. You must comply with all policies and guidelines relating to security and privacy of personal and confidential information, ignorance of which can lead to disciplinary measures. Responses to requests for such information may be provided only as permitted by applicable internal policies and authorization, law or regulations. Workforce guidelines for privacy and security cover our employees as well as other individuals whose information is provided to the Company within the context of the working relationship.

Protecting Proprietary and Confidential Information

Proprietary and confidential information relating to the Company's business and operations (listed illustratively below) is the property of the Company. It may include sensitive information and data that is not in the public domain and should not be shared.

- The Company's business plans
- The Company's financial performance, if it has not been disclosed
- The Company's trading activities, holdings of investments
- Customer data
- Our suppliers and distributor relationships
- Employee data
- Information relating to our products, services, and pricing
- Intellectual property the Company has not disclosed to the public
- Information relating to technology, systems and processes
- Information related to Data centers
- Passwords, computer programs and software being used by the Company
- Marketing plans, strategies, and costs
- Potential acquisitions and divestments

You must safeguard and not disclose or misuse personal or confidential information about the Company, its customers, suppliers, distributors or employees to any unauthorized person (including other employees) or external entities, except where permitted or required by applicable law, administration, legislation or regulation. Improper release of or unauthorized access to confidential information damages our customers' trust in the Company and can result in loss of business and even legal action. All employees of the Company are required to sign a declaration of fidelity and secrecy in the prescribed form.

While maintaining the above guidelines, we should practice the following:

- Keeping records that are complete and accurate (retaining them for the required period of



time as per policies and disposing the information which is not required to be filed or maintained for records).

- Complying with legal, accounting, tax, IT security and regulatory reporting requirements (including the timely submission of required filings).
- Taking reasonable steps to properly safeguard the Company's information against loss, damage, misuse or unauthorized or unlawful use and acquiring and handling it in accordance with internal policies.
- Protecting company information from illegal copying or other misuse of our logo, patents, trademarks and copyrights in accordance with our branding standards.
- Maintaining business continuity measures to protect staff, critical businesses and functions in the event of a business disruption.
- Ensuring that access to work areas, infrastructure and computers is properly controlled.
- Not communicate about proprietary or confidential information in public places such as elevators, hallways, restaurants, restrooms and public transportation, or through mobile phones, the Internet or any other electronic media (including blogs and social networking sites).
- Promptly reporting any concerns regarding records that contain questionable or inaccurate information; or any instance where an individual is misusing or not appropriately safeguarding Company's Information.

Once our employment or association with the Company ceases, you must return all means of access to Company information, copies of such information, any Company property, including but not limited to all ID cards, keys, telephone cards, laptops, cellular phones, fax machines and any other means of accessing such information. Forwarding of such information to personal computer, any e-mail address, or to any third-party service provider, server or website, or engaging in any other unauthorized use, misappropriation or disclosure of such information in anticipation of your resignation or termination of employment can lead to disciplinary issues. Similarly, you may not bring to the Company any trademark or confidential information of any former employer, or use such information to aid the business, without the prior consent of your former employer and unless permitted by applicable law or regulation.

Commitment to External Stakeholders

Maintaining Business Relationships and Fair Competition

The Company's commitment to dealing with external stakeholders such as customers, competitors, suppliers, and any related agency is based on the principles of fair competition, compliance with laws and regulations of the land, and in the spirit of honesty and integrity of our corporate values.

While maintaining a competitive outlook in the market, we will practice the following:

Following transparency in all of our business dealings

- Conducting business in accordance with applicable laws and regulations
- Respecting the confidentiality, privacy and intellectual property of external stakeholders
- Transfer of accurate and complete information from and to our customers while complying with internal proprietary policies, data protection laws and any contractual obligations
- Avoiding conflict of interest in business dealings for the customer whose assets we manage. This includes having controls to minimize and resolve potential conflicts
- Fair hearing to any concerns from our customers while acting promptly on the resolution. If the



complaint involves data privacy or an accounting or auditing matter, special measures will be followed.

- In terms of supplier relationship, the Company's protocols on pricing quotation, SLAs, quality of services or goods or any other related matter will be followed in compliance with internal and external rules or be subject to other internal restrictions or disclosure obligations under securities or other laws.

To maintain the spirit of fair dealings with any external body, we will refrain from the following:

- Engaging with any third party known to be involved in manipulative or concealing market practices (fixing prices, allocating sales markets, exclusive dealing with vendors) or with activities that threaten public order or safety.
- Payment, acceptance, offer, or authorization of money, gifts, or any other forms of bribe and corruption with the customers.
- Offering of anything of value to external stakeholders that could be construed as requiring or influencing any official decision and would give an impression of either obtaining or retaining business, suggesting that any business or service may be withdrawn or awarded in return for other business or securing an improper advantage vis-a-vis other organizations in the market.

Maintaining Transparency with Regulators

The Company maintains a candid and proactive relationship with its regulators. This includes appropriately communicating significant corporate developments and actions to relevant regulators. Utmost co-operation with the regulators and thorough understanding of the regulators' mission, perspective and processes in alignment to Company's internal policies and procedures is of key importance. The Company's commitment to following applicable laws, rules, and regulations of all localities, states, and countries where we do business, is not only the right thing to do, it helps maintain and protect our reputation. As an employee, you are expected to support this commitment and to serve the Company's best interest by:

- Being responsible for ensuring that conduct in our activities are in accordance with the principles mentioned in the regulatory bulletins, circulars, advisories, manuals, checklists, and other guidance inclusive of statutory compliance and risk management guidelines.
- Discourage lobbying activities that attempts to influence or defeat the legislation on behalf of the Company.
- On suspicion of any untoward activities relating to conduct and relationship with regulators, promptly bringing to the notice of the compliance officials.

Co-ordination with Government and Regulators

All employees are expected to be responsive, fair and transparent with officers from regulatory, legislative or administrative bodies. Responses to regulatory information requests should be completed accurately within the agreed time frame as per the internal policy guidelines and external regulations and must be safeguarded for delays, if any, by keeping the internal and external authorities in loop. You are also required to co-operate and report (and not withhold or misrepresent any information) for any violations of regulations, laws, internal processes, contract requirements, guidelines, etc., in any investigation as an involved party, witness or in terms of role responsibility. It is prohibited to disclose any aspect of investigation to any persons (either within us outside the organization) and maintain confidentiality of the situation. Making false statements, misleading internal or external auditors, investigators, legal counsel, other employees, regulators or other governmental entities can result in severe penalties.

Workplace Conduct & Acceptable Social Behavior

All employees are expected to adhere to all applicable Laws, rules, principles and norms of society. The Company rejects all contacts with individuals or entities involved in activities in violation of the law or accepted standards of responsible social behavior, which adversely affect public order and the wholesome operation of the Company.

Fair behavior and Employment Practices

All employees are expected to practice our Code of Conduct and Ethics guidelines and maintain professionalism, integrity, mutual respect and fairness in our daily course of business and relationship with colleagues or any other point of contact (internal or external). We aspire to be a meritocratic organization wherein employees continuously and consistently strive to demonstrate excellence and initiative. We, therefore, are committed to providing employees with the best opportunities to realize their potential and an environment where diversity is embraced. At all times, we must treat our teammates with respect, share the responsibility for our successes and accept accountability for our failures. Employees are prohibited from creating situations which are threatening, intimidating, hostile, spreading false rumors or display abusive behavior in the workplace. We should strive to maintain a disciplined, ethical, healthy and productive work environment and resolve any conflicts in an amicable manner. Respectful workplace concerns escalated by employees and/ or customers will be taken seriously and dealt with promptly. You should refrain from favoritism and making business decisions on emotions. All employees should also honestly disclose any information on family or relatives who work at the Company. No employee shall use his position or influence directly or indirectly, to secure employment for his son, daughter or any other member of his family in any private undertaking having official dealings with the company (this will include the Company's borrowers, contractors, consultants and vendors).

As a Company, we seek to maintain an inclusive diversity of our staff across branches and departments and recruit, develop and retain highly qualified, diverse and dedicated individuals for our workforce. The equal employment opportunity principles are based on fair employment regulations and non - discriminatory practices at workplace.

Harassment and Discrimination

Harassment is an undesirable verbal or physical behavior that interferes with work or creates an intimidating, hostile or offensive work environment. Examples include:

- Public or private tirades or bullying by a supervisor, subordinate, or peer
- Severe or repeated insults related to personal or professional competence
- Threatening or insulting oral or written comments
- Deliberate desecration of religious, racial, ethnic, or national symbols
- Malicious and knowingly false complaints against others

We prohibit from any discrimination (race, gender, caste, religion, disability, marital status, pregnancy, culture, ancestry, socioeconomic status etc.) while in employment or advancement. The Company promotes a work environment where employees are valued and not discriminated on the basis of any reason. We prohibit discrimination or harassment of any nature that violates our policies, whether committed by or against a manager, co-worker, client, supplier or visitor.



The Company prohibits uses of its communications, equipment, systems and services, including e-mail services and/or intranet/Internet services, to create a hostile, discriminatory, or offensive work environment. This includes downloading, transmitting, viewing or exchanging “jokes,” pictures, stories, videos or other communications or content which are threatening, harassing, demeaning or offensive to any individual.

Social Media

Social media like blogs, wikis, social networks, team spaces are changing the way we are communicating and engaging with customers, colleagues and the world at large. In view of the growing prominence of social media and increased use of these technology platforms by customers, Company uses Social Media platforms to engage with customers, exemplify company / brand values, draw awareness to its products and services, gain feedback and position itself as a technologically savvy and innovative financial services provider. The Company currently has its social properties across 6 mainstream social channels – Facebook, Twitter, YouTube, Google+, LinkedIn & Instagram.

While the Company recognizes the ubiquity and benefits of social media in building stronger and successful business relationships, it is desirable to provide guidance to employees on what is appropriate and acceptable to post about the Company or its products, services, employees and other stakeholders in social networking sites and media. The Company’s core values together with the Code of Conduct and Ethics provide the foundation for the guidelines for the use of social media by employees. The principles and guidelines enunciated in the Code of Conduct and Ethics, apply to the employees of the Company and their activities, be it traditional media or online.

The following disclaimer should be pasted on the employee’s personal social media profile(s), where matters related to the Company are discussed / likely to be discussed – “Views expressed are the personal views of the user and do not necessarily represent the opinions of Company and Company takes no responsibility whatsoever if anyone acts on the basis of the views expressed.” Employees must only use their personal email ID to create a personal website or post content on Social Media. Employees are advised to refrain from engaging in discussions which may hurt people’s religious, racial and political sentiments or posting comment, content or images which are libelous, offensive, harassing, threatening, hateful, intruding privacy, inappropriate and obscene or in violation of the Company’s internal guidelines, including POSH guidelines, or any applicable law. Employees should not publish, post or engage in discussions in the social media that are considered confidential and not made available in the public domain by the Company. It is imperative that employees use good judgment and common sense to ensure that their actions reflect the values of the Company.

Maintaining accurate Company Records and Reporting Requirements

Data and information relating to the Company that is publicly disclosed or is provided to regulators should be complete and accurate. The Company is committed to integrity of financial reporting and complete disclosures as mandated under applicable law and regulation. Falsification of any information or data (i.e. mis- statement, alteration, modification, omission or deleting of information) related to the Company is a serious misdemeanor and is prohibited.



Information Security

Information Security is the practice of protecting information and systems from unauthorized access, use, disclosure or modification. Company has developed procedures covering physical access control to ensure privacy of communications, maintenance of the security and safeguard Company's assets from theft, misuse and destruction. Employees are responsible for complying with the security policies of the Company. Employees must be aware of our policies and procedures relating to information management. All information must be treated in accordance with our Information Security and Privacy Policy.

By practicing small and simple steps we can make a big difference in protecting our information assets like

- Always use strong passwords for all your accounts.
- Lock your computer screen whenever you leave the work desk.
- Lock away all documents and files before leaving the office.
- Pick printouts immediately after printing. Do not leave them unattended.
- Shred hard copies with sensitive information before disposal.
- Always ensure that nobody is behind you while logging into official account to avoid shoulder surfing.

Infractions of the Code

The Company has a "zero tolerance" policy for any violation of the Code of Conduct and Ethics. This means that when an occurrence of a violation has been verified, appropriate action commensurate with the nature and pervasiveness of the violation will be taken. Employees who violate the Code may be subject to disciplinary actions, up to and including termination. The following behaviours at work or activities while using Company's systems are examples of actions that are prohibited and can result in disciplinary action. This is only an indicative list and not exhaustive. The Company reserves the right to take Disciplinary Action against any unethical activity that is in violation of the Law or acceptable standards of responsible social behavior:

- Sending or posting discriminatory, harassing, or threatening messages or images through the Company's internal mails and internet.
- Using the Company's time and resources for personal gain.
- Stealing, using, or disclosing someone else's code or password without authorization.
- Copying, pirating, or downloading software and electronic files without permission.
- Engaging in unauthorized transactions that may incur a cost to the organization.
- Participating or doing any activity that could damage the Company's image or reputation.
- Participating in the viewing or exchange of pornography or obscene materials.
- Attempting to break into the computer system of another organization or person.
- Refusing to cooperate with investigation.
- Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities.
- Using the Company's internet/ intranet for promoting political causes or activities, religious activities, or any sort of gambling.
- Sending anonymous e-mail messages.



- Engaging in any other illegal activities.
- Working under the influence of alcohol or illegal drugs.
- Fighting or threatening violence in the workplace.
- Spreading rumors and un-authenticated information
- Use of foul language (including verbal) in the workplace.
- Negligence or improper conduct leading to damage of Company or customer-owned property.
- Insubordination or other disrespectful conduct with colleagues, customers etc.
- Violation of safety or health rules.
- Smoking in the workplace at non-designated areas.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, in the workplace.
- Excessive absenteeism, overstaying leave or leaving workplace without permission or any absence without notice.
- Unsatisfactory performance or conduct.
- Refusing reasonable directions including moderate changes in responsibilities that may from time to time be given on account of business necessity and exigencies.
- Participation in any demonstration against the Company or its officials.
- Violation of any of the provisions of the security policy including IT security policy of the Company.
- Failure to perform duties with utmost integrity, honesty and diligence.
- Submitting and claiming false bills for reimbursement.
- Violation of the Company's Dress Code.

Manager and Leader Responsibilities

As a progressive organization, managers and leaders have a special responsibility to demonstrate our values through their actions. As Managers and leaders, you must foster an environment of integrity, honesty and respect. This includes creating a work environment that is free from discrimination, harassment, intimidation or bullying of any kind. You must also ensure that all aspects of the employment relationship are free from bias and that decisions are based upon individual performance and merit. As a Manager or senior leader, you are therefore additionally accountable for the following:

- To be thoroughly familiar with the requirements of and the procedures established by the Code and to exemplify the highest standards of ethical behavior.
- To ensure that team members understand that business results are never more important than ethical conduct and compliance with applicable law and the Company's policies.
- To ingrain the principles of the Code and compliance with applicable laws, regulations, and policies into your business unit's practices.
- To create a culture in which team members feel comfortable asking questions and raising ethical concerns without fear of retaliation.

Disciplinary Procedures and Penalties

For violation of the Code or any orders /rules issued by the Company, an employee shall be liable for any of the following penalties:

- Caution
- Warning
- Discharge from service.
- Dismissal from service and/or Recovery from salary or such other amounts as may be due to him of the whole or part of any pecuniary loss caused to the Company by negligence or breach of orders

Review of the Code of Conduct

The Code of Conduct & Ethics to be reviewed annually and necessary amendments / modifications may be carried out as deemed necessary and appropriate.