

Sriffin Credit Private Limited

Employee Code of Conduct

I. Purpose

- a) To define the working guidelines for employees at the workplace.
- b) To maintain high standards of professional and work performance.

II. Scope

This code of conduct applies to all employees of the Company and its associates like consultants and contract employees.

III. Procedure and Guidelines

The Employee Code of Conduct ("Code") provides guidelines to employees in their personal and professional conduct at the workplace or about their work. These guidelines are not exhaustive and should be construed accordingly. In case of any difficulty, the employees can seek clarifications from HR Department.

IV. Personal Responsibility

- a) We expect all Employees to know right from wrong and to always choose right over wrong.
- b) Employees should read and familiarize themselves with the Code with the attitude of compliance and spirit of rules presented.
- c) Employees are expected to follow the highest standards of ethical conduct and integrity and shall work to the best of their ability and judgment.
- d) Employees are required to undertake their duties in a professional, responsible, careful and ethical manner when dealing with business associates and fellow employees.
- e) Every Employee should adhere and conform to the various statutory and mandatory regulations / guidelines applicable to the Company.
- f) Every Employee should maintain the Company records, documents and information as accurately & completely as per applicable guidelines.
- g) Financial books and records must conform to applicable law, accounting principles, and Company policy.

V. Professional Conduct at Workplace

- a) Every Employee is responsible and accountable to uphold the Company values.
- b) Every Employee shall comply with and obey all legal & regulatory guidelines/mandates and

directions which may, from time to time, be given to them in the course of their employment with the Company.

- c) Employees must disclose to the HR Department of any outside interest or activity in which they are engaged.
- d) Every Employee should be fair and respectful in dealing with fellow Employees irrespective of age, gender, religion, caste, or mental or physical ability.
- e) Employees should discharge their responsibilities within the acceptable legal framework and always protect the interests of the Company.
- f) Employees should always maintain proper records and adhere to stipulated policies and procedures.
- g) Employees should not damage, dispose or in any other manner, interfere with official documents or files and should follow the prescribed guidelines in the Policy on Record Retention and Maintenance.

VI. Business Ethics and Conduct

The Company encourages its Employees to practice the highest standard of business ethics for conducting its business with Customers and enhancing Customer Experience at all stages of business, therefore:

- a) Employees should not solicit commission or fees in any form for providing services from the Company and/or any Business Partner of the Company. This includes all favors in cash or kind.
- b) Employee should not knowingly process any Product of the Company to any person who is not eligible as per Company policy by hiding or manipulating the information.
- c) Employees should not use any coercive language with the Customers and colleagues.
- d) Employee should give the right information on facilities provided to customers & how they can avail of services and whom they may contact for addressing queries.
- e) Employees should explain correct information about product/services, terms and conditions, and applicable charges to customers.
- f) Employees should adhere to the grievance redressal policy for customer complaints if any.

VII. Conflict of Interest

- a) Employees must avoid conflict of interest from personal activities by disclosing all the activities before accepting employment. All transactions by an Employee of the Company should be at arm's length and at fair market prices.
- b) No customary gifts or favors received from or offered by external parties particularly business associates must not be accepted, which might result in undue benefits.

- c) No Employee should be served as Director or committee member for any profit or non-profit organization without approval from appropriate authority.
- d) Employees are restricted to take any full time or part time employment anywhere outside of the current organization.
- e) Employees should avoid conflicts of interest and should seek clarification about potential conflicts from their reporting managers or HR Department.
- f) Employees and their families shall not seek, accept or receive, directly or indirectly any gift, payments or favor in whatsoever form from Company's business associates, which can be perceived as being given to gain favor or dealing with the Company and shall ensure that the Company's interests are never compromised.
- g) Employees are prohibited from misusing insider information, before public disclosure, by purchasing or selling company securities for their benefit or the benefit of members of their immediate family.
- h) Employees should avoid any financial involvement or undertaking that could directly or indirectly compromise or undermine the performance of their duties or the Company's activities.
- i) Employees must disclose financial interest if they have in any of the business associates (directly or indirectly).
- j) Employees should not be involved in any act that could be interpreted as seeking, receiving, or dispensing a bribe, kickback or questionable payment.

VIII. Confidentiality

- a) Any information related to the business of the Company, its operations or finances which would reasonably be considered to be proprietary, or which is designated as such in writing by the Company shall be deemed confidential.
- b) Any employee shall not disclose Confidential Information to any person, except to its Affiliates and those of its employees or representatives who need to know such Confidential Information in connection with the conduct of the business of the Company or the exercise of its rights hereunder or as may otherwise be required by law, and not to use the Confidential Information for any purpose other than in connection with the conduct of the business of the Company, the exercise of its rights hereunder or its assessment of an investment in the Company.
- c) No Employee should interact with Media except those who have been designated as Company's spokesperson to handle exchanges with the media.
- d) No Employee should pass sensitive or critical information (directly or indirectly) to anyone outside of the Company.

- e) All inquiries or calls from the press and financial analysts should be referred to the Communication team.
- f) Employees are not allowed to post or discuss information concerning the Company's services or business on social media.

IX. Workplace Safety

- a) Each Employee is responsible for taking precautions necessary to protect themselves and their colleagues, including immediately reporting accidents, injuries and unsafe practices and conditions.
- b) Employees should not engage in any assaults, hostile physical contact, intimidation, fighting, verbal threats or violence while on Company property or Company business.
- c) Employees must not carry weapons while conducting Company business, in Company vehicles or personal vehicles when on Company property.
- d) Employees should not work or report to work while impaired by alcohol, illegal drugs or controlled substances.
- e) Employees are prohibited from possessing, selling, using, distributing, or offering to others any illegal drugs or controlled substances.
- f) Any violation to the above would lead to enforcement of disciplinary action by the Company.

X. Jurisdiction/Delegation of Authority

- a) Employees are expected to discharge their responsibilities as per the delegation matrix.
- b) No Employee shall exceed delegations/discretionary powers under any circumstances.

XI. Proper Use of Company Assets

- a) Every Employee has a responsibility to protect our assets against loss, theft and misuse.
- b) Assets include cash, equipment, inventory and computer software, systems and other intellectual property.
- c) Funds and property should only be used for the benefit of the Company.
- d) Theft, embezzlement, or misappropriation of the Company's property is prohibited.
- e) Employees are expected to use the Company assets for office purposes and should not be used for personal activities.

XII. Information Technology

- a) Employees must not access information that they are not authorized to access or use, and must not allow any other person access for any reason.
- b) Employees must take all reasonable precautions, including password maintenance and file protection measures to prevent unauthorized access and have an obligation to maintain

the security and confidentiality of the information systems over which they have responsibility or control and that are owned or used by agreement.

- c) In case an employee comes to know of these conditions are being violated by anyone, the same should be reported to Legal & HR Department.

XIII. Cooperation with Government Authorities

- a) Every employee should cooperate with all reasonable requests related to the Company's operations from Government Authorities.
- b) All information provided to Government Authorities should be accurate and truthful.
- c) Every employee should consult with an authorized/appropriate person in the Company before responding to such requests.

XIV. Prohibition of Harassment, No Discrimination and Equal Opportunity

- a) The Company prohibits all types of harassment including any age, gender, religion, caste, race, mental or physical ability, or origin.
- b) Employees are expected to maintain a productive work environment that is free from harassment and disruptive activity.
- c) The Company does not discriminate or allow discrimination based on any status and commits to implementing strict guidelines defined in anti-discrimination laws.
- d) Any Employee who feels that they are the victim of harassment/discrimination should immediately report to reporting manager or HR Department.
- e) Any charge of harassment will be investigated promptly and appropriate action will be taken against employee's/business associates who are found to have violated the policy on harassment at workplace.

XV. Relationships at Workplace

- a) Employees should declare themselves if any of their relatives are working in the Company to avoid preferential treatment.
- b) Employees are expected to withdraw themselves in circumstances where there may be a real or perceived conflict of interest like financial matters, recruitment, performance assessment and supervisor of relations.
- c) The Company's defined policy around recruitment of relatives would apply.

XVI. Adherence to Policies and Procedures

- a) Employees should follow the Company's policies and procedures.
- b) Employees are expected to make themselves aware of all the policies and procedures

of the Company.

- c) Employees' personal views should not impact the Company's objectives. In case of any query, Employees should get clarity from their reporting manager or HR Department.

XVII. Ownership of Products and Copyright

- a) The Company retains the copyrights of work produced by an Employee during employment.
- b) At the time of separation, the Employee should return all correspondence, documents, emails, data, information equipment and works related to employment. At no stage should an attempt be made to copy or pass on information or data to anyone outside of the Company.

XVIII. Violation of Code of Conduct

- a) All Employees should read and follow the Code without fail. If any questions, they should seek clarification from their reporting managers or the HR Department.
- b) Employee should promptly report any violation to the appropriate authorities.
- c) Violation of the Code is considered seriously and appropriate corrective action shall be initiated which is not limited to immediate termination of services of the Company.

XIX. Amendment to Policy

The CEO based on the recommendations of COO & Head HR can amend this Policy, as and when deemed fit. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

All employees are required to read, understand, and sign the declaration as per Annexure I

ANNEXURE 1 – DECLARATION

I, _____, hereby declare that I have carefully read and understood the Code of Conduct (“Code”) and understand my obligations as an employee of Srifin Credit Private Limited (“Company”).

I also understand my obligation to comply with the Code, as may be amended from time to time.

I agree to abide by the terms of the Code and to discharge my duties in good faith and the best interests of the Company.

I am aware that the Company has a “zero tolerance” policy for violation of the Code and any failure to abide by the above Code shall lead to disciplinary action as per Company’s policies.

I am aware that it is my responsibility to be updated with the amendments or introduction of new policies concerning the Code and in the event of any conflict of interest, at the time of appointment or during employment to bring the same to the attention of the Company.

Signature:

Date:

Name:

Employee Code:

Place: