

SWARA FINCARE LIMITED



CODE OF CONDUCT (COC)



SWARA FINCARE LIMITED

The Code of Conduct for all employees of Swara Fincare Limited (hereinafter referred to as the "Company") has been formulated and implemented in line with the requirements for good corporate governance and ethical business practices. The Company is committed to conducting its business with integrity, accountability, and in compliance with all applicable laws and regulations. This Code outlines the expectations of professional behaviour for all employees, regardless of their role, function, or seniority.

This Code is not exhaustive and should be interpreted with common sense and in the spirit of integrity. In case of any doubts or difficulty in interpreting the provisions of this Code, employees may seek clarification from their Reporting Manager, Human Resource Department (HR), or Compliance Officer.

1. **Compliance with Laws and Regulations:** All employees must comply, in letter and in spirit, with all applicable laws, regulations, and policies. The Company expects each employee to uphold the highest standards of legal and ethical conduct and encourages reporting of any breach to the appropriate authority.
2. **Information security and protecting Company assets:** The employees must ensure that the Company's assets, both tangible and intangible, are used only for authorized business purposes. Employees are expected to comply with the Company's Information Security Policy and protect sensitive business information.
3. **Workplace conduct, behaviour & disciplinary rules:** All employees are responsible for upholding the Company's values and maintaining a professional and respectful work environment. Any form of misconduct, unethical behaviour, or violation of Company policy shall be strictly dealt with. Misconduct includes, but is not limited to:
 - Engaging in illegal or unauthorized activities;
 - Fraud, embezzlement, theft or misuse of the Company resources;
 - Misrepresentation or falsification of data/records;
 - Harassment, discrimination or physical assault;
 - Violation of attendance and leave policy;
 - Conflict of interest or unauthorized business dealings;
 - Damage to the Company property or reputation.



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Any act against the Company's values may be treated as a misconduct depending on the nature and seriousness of the activity.

4. **Gender friendly environment:** The Company is committed to fostering a respectful, inclusive, and gender-sensitive work environment. Any form of sexual harassment or gender-based discrimination is strictly prohibited. The Internal Complaints Committee constituted under the Prevention of Sexual Harassment (POSH) Act addresses such complaints.
5. **Social responsibility:** Employees should be mindful of the Company's role in society and strive to act in a socially responsible manner, including respect for the environment and the principle of sustainable development.
6. **Cost consciousness:** Employees are expected to exercise financial prudence and ensure optimal use of the Company resources. The Company facilities should not be used for personal purposes unless explicitly permitted.
7. **Health, safety & environment:** The Company aims to provide a safe and healthy working environment. Employees must adhere to safety guidelines and report any hazards or unsafe practices. Substance abuse or any form of violence in the workplace is prohibited.
8. **Conflict of interest:** The employees must avoid situations where personal interests conflict with those of the Company. Any potential conflict should be disclosed to the HR Department. Gifts and benefits may be accepted or offered only within ethical and legal boundaries.
9. **Proper use of the Company assets and opportunities:** Employees should use the Company's property and information only for legitimate business purposes.
Employees should not:
 - Use the Company assets or information for personal gain;
 - Take advantage of business opportunities for personal benefit;
 - Engage in activities that directly or indirectly compete with the Company.
10. **Fair dealing:** The employees should treat clients, customers, vendors, and colleagues fairly and with respect. Manipulation, misrepresentation, or any form of dishonest conduct is not tolerated.
11. **Confidentiality:** The Employees must maintain confidentiality of all sensitive or proprietary information related to the Company, its clients, vendors, and



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partners, and other stakeholders. Disclosure is allowed only when legally mandated or authorized.

12. Violations of the Code: Any breach of the Code or unethical behaviour should be reported to the Reporting Manager, HR, or Compliance Officer. Violations may result in disciplinary action, including termination of employment.

13. Waivers: In rare and exceptional cases, a waiver of certain provisions of the Code may be granted by senior management or the Board of Directors of the Company. Such waivers must be documented and justified.

14. Amendments: The Company reserves the right to amend or update this Code from time to time. All the employees shall be intimated of any such amendments.

By adhering to this Code, every employee contributes to a professional, ethical, and successful organization.

