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**MONEDO FINANCIAL SERVICES PVT. LTD.**

**ETHICS POLICY**

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## **1.Objective:**

This Policy contains the moral and ethical standards by which the Company, its Board, each employee, officer and Employees of the Company is to conduct the business activities of Monedo India.

## **2.Policy guidelines:**

### **A. INTEGRITY**

The business of Monedo Financial Services Pvt Ltd shall be conducted according to the highest standards of integrity and ethics, with due regard for all applicable laws. Each employee, officer, director is expected to exercise sound judgment in all matters involving business ethics and integrity and to refrain from any conduct that could be questionable on ethical grounds.

### **COMPLIANCE WITH LAWS**

Fundamental to high ethical standards is that all Employees, Officers and Directors are expected to be familiar with the laws, rules and regulations applicable to their areas of responsibility and are expected at all times to comply with all applicable laws and regulations and to comply fully with the policies of the Company.

### **3.DUTIES AND RESPONSIBILITIES OF INDEPENDENT DIRECTORS**

An independent director shall:

1. uphold ethical standards of integrity and probity.
2. act objectively and constructively while exercising his duties;
3. exercise his responsibilities in a bona fide manner in the interest of the company;
4. devote sufficient time and attention to his professional obligations for informed and balanced decision making.
5. refrain from any action that would lead to loss of his independence.
6. Where circumstances arise which make an independent director lose his independence, the independent director must immediately inform the Board accordingly;
7. assist the company in implementing the best corporate governance practices.

### **4.EQUAL EMPLOYMENT OPPORTUNITY**

All Employees and applicants shall be treated equally according to their individual qualifications, abilities, experiences, and other employment standards.

There will be no discrimination due to race, religion, color, national origin, sex, age, disability or veteran/military status. The prohibition of discrimination based on sex includes sexual harassment. Every employee, officers and directors are expected to comply with the Company's policy against harassment, a copy of which may be obtained from HR, if necessary.

### **5.ENVIRONMENTAL RESPONSIBILITY**

It is the policy of Monedo Financial Services Pvt Ltd, as a part of the larger community and responsible citizen, to protect the environment for the health, safety and quality of life of our communities, customers and the public at large. Compliance is the baseline of performance for all Monedo operations and Employees. Every employee should be familiar with the Environmental Impact Management Policy, a copy of which may be obtained from HR, if necessary.

## **6.SAFETY**

Our goal is to protect all those employed with the Companies economic activity from work hazards and personal injury.

Our Workplace Safety and Health Policy part of Employee Handbook contains our objectives and strategies to meet our goal.

All operations of the Company are subject to this Policy, a copy of which may be obtained from HR, if necessary.

## **7.FAIR DEALING**

The Company is committed to dealing fairly and honestly with its customers, suppliers, and competitors. Employees, Officers and Directors may not offer customers (or Employees of customers) any benefits, rewards, or things of value, which may violate the law, the customer's policies, or our business practices.

Our policy is to compete solely on the merits of our products and services. No false or misleading statements or innuendo will be made out for our competitors.

All comparisons of our products or services with those of our competitors must be accurate and factually supported. Employees, Officers and Directors are strictly forbidden from using any illegal or unethical methods to gather competitive information.

## **8.POLITICAL AFFAIRS**

No contributions from Company funds are to be made directly or indirectly, to any political candidates or political organizations unless permitted by law and approved by Promoter Director/s.

## **9.CONFLICTS OF INTEREST**

Each employee, officer and director have the legal duty to carry out his or her responsibilities with the utmost good faith and loyalty to the Company. An employee, officers and director should never place himself or herself in a position where his or her personal interests could interfere in any way with the interests of the Company or any of its subsidiaries.

## **10. MISUSE OF ASSETS OR SERVICES; ACCURATE AND COMPLETE RECORDS**

Using any funds or other assets of the Company, or providing any services for any purpose, that is unauthorized by the Company or violates the law of any applicable jurisdiction (domestic or foreign) is strictly prohibited.

Employees should ensure that corporate records fairly and accurately reflect all transactions and dispositions of our assets in reasonable detail. No false or artificial entries shall be made in any Company books or records for any reason, and no employee shall engage in any arrangement that results in such a prohibited act. Employees are expected to cooperate fully with auditors of the Company.

## **11. IMPROPER INFLUENCE, FOREIGN CORRUPT PRACTICES ACT**

No offer of or payment of any gift, loan or gratuity is to be made either directly or indirectly to any business or government entity or any employee of such in exchange for or otherwise to procure business for the Company. Gifts and entertainment may be used with representatives of customers or potential customers if they are of limited value, are customary in the situation, are legal and their public disclosure would not embarrass the Company.

## **12. COMPLIANCE WITH THIS POLICY**

All Directors, Employees and Officers of the Company are responsible for the enforcement of and compliance with this Policy and to ensure Employees' knowledge and compliance. All recipients of this Policy and any agents of the Company have the responsibility to fully comply with this Policy.

This Policy will be enforced at all organizational levels. Anyone who violates this Policy will be subject to disciplinary action. This Policy does not in any way alter the right of either the employee or the Company to terminate employment at any time, with or without cause.

Any waiver of the Policy for Directors may be made only by the Board of Directors.