

HIRANANDANI FINANCIAL SERVICES PRIVATE LIMITED

CODE OF CONDUCT POLICY

VERSION Control

Date of Approval	Approving Authority
February 02,2025	Board of Directors
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CODE OF CONDUCT POLICY

HFS's growth aspirations are built on a rich legacy of fair and transparent governance and disclosure practice. This includes respect for human values, individual dignity, and the adherence to honest, ethical and professional conduct. Employees are guided by HFS's vision and values to help build the success and reputation of the brand.

The CODE OF CONDUCT ('hereon to be referred to as the 'Code') aims to define the requirement and standards of expected business conduct. Employees, trainees and whole time Directors are expected to read and understand this Code, uphold these standards in day-to-day activities, comply with all applicable policies and procedures, and ensure that all are aware of, understand and adhere to these standards.

Since we are committed to continuously reviewing and updating our policies and procedures, this Code is also subject to modifications. The principles enshrined under the Code are inclusive in nature and the various circulars or directions issued by management must be read along with this Code.

1. Applicability

The Code applies including but not limited to Directors, Senior Management, including Employees, Trainees and Third party staff in the organization.

HFS recognizes the need for this Code to be applied equally to everyone it covers. All employees irrespective of grade or tenure are expected to comply with the provisions of this Code.

The Code will be strictly enforced and any violations will be appropriately dealt with, including taking corrective and / or disciplinary action up to and including dismissal or removal from office.

2. Honesty, Integrity, Ethics

All employees must act in conformity with the professional standards of honesty, personal integrity and ethical conduct, especially when on business, at sponsored events, or when representing HFS at external events. Ethical conduct is one that is free from fraud and deception, and free from actual or potential conflict of interest between personal and organizational needs and / or values.

3. Workplace Responsibilities

- Respect for Individuals / Fair Employment Practices
- All employees must treat their colleagues and business associates with dignity and respect, irrespective of caste, creed, gender, religion / region, nationality, appearance or any disability.
- Employees must not use abusive and offensive language or any kind of gestures with their colleagues or business associates.
- Employees must not engage in any activity that is likely to result in disturbing the peace and harmony of the workplace.

4. Discrimination, Harassment and Intimidation

HFS is committed to the prohibition of harassment (including sexual harassment) and intimidation of employees at the workplace as it interferes with one's right to individuality. HFS has endeavored to provide easily accessible reporting channels to every employee and ensure confidentiality to the degree feasible. If an employee feels that he / she has been subjected to any form of harassment, it is that employee's responsibility to report the matter through one of the available channels.

5. Alcohol and Drug Free Environment

Consumption of Alcohol and / or banned substance by any Employee at the workplace is strictly prohibited. Violation of this policy by any Employee will result in disciplinary action.

6. Safe and Healthy Environment

The Org. considers safety of Employees as a primary concern and expects its businesses and Employees to comply fully with the appropriate laws and internal regulations.

The Org encourages Employees to showcase responsible behaviour that results in the best possible accident prevention measure. This applies to both: the technical planning of the workplace, equipment and processes, and the safety management and personal behaviour in everyday workplace.

Employees must strive to keep their own workplace and surroundings clean and hygienic. Employees must endeavor to create a safe working environment by following the policies and procedures of Health and Safety as applicable.

7. Contact with the Media and Social Media Policy

Employees must refrain from sharing intellectual property, on personal accounts without prior approval. Our confidentiality policies and applicable laws regarding proprietary information must be followed at all times. Employees are also prohibited from using any office property or infrastructure, including facilities, equipment, or devices, for creating or sharing social media posts or videos.

Always act responsibly and in accordance with company policies when engaging in public discussions or sharing content online.

8. Sharing of Official Information

- Employees must not divulge or communicate sensitive / confidential information to third parties, except when authorized to do so for business reasons.
- Employees must ensure that they do not tarnish HFS's reputation through their communication to any external agency, customers, vendors, etc.
- Employees must desist from indulging in rumor mongering or loose talk that could prove detrimental to HFS's brand.
- All public statements attributed to HFS and its employees should be carefully considered, and personal views should be kept separate from that of HFS's.
- When publishing articles, delivering speeches or lectures on business, professional or managerial topics, employees are required to take prior approval of their manager. Employees must be clear

that in such forums, they are acting as private individual(s), and not as representative(s) of the Company.

9. Accuracy of Company Records and Reporting

A. Reporting by Employees

Employees must ensure that company records, data and information owned, collected, used and managed by them are accurate and complete. Records must be maintained as per the applicable record retention policy, in sufficient detail so as to accurately reflect all transactions undertaken by the Company.

Employees must assist in maintenance of appropriate records so as to ensure that financial transactions are prepared in accordance with generally accepted accounting principles, and that they fairly present the financial condition and results of the Company. Non-maintenance of records that come to the notice of any employee(s) and any misappropriation or tampering of records needs to be reported to the relevant authority / department immediately.

B. Reporting to Government / External agencies

HFS has a responsibility to communicate effectively with its stakeholders / investors and provide full and accurate information, in all material respects, about the Company's financial results and condition of operations. All such reports and documents must be filed with or submitted to regulatory authorities or as prescribed by the law. Hence, such reports and any other mass communication should be full, fair, accurate, timely and understandable.

10. Avoiding Conflict of Interest

HFS encourages employees to take part in community activities and explore personal interests, as these can bring energy and positivity to the workplace. However, employees must ensure that these activities do not interfere with their job responsibilities or create a conflict of interest.

Examples of conflicts of interest include:

- Engaging in business activities, gainfully employed or any other ventures simultaneously while employed at HFS for financial gains.
- Running a business that competes with HFS or working for a competitor.
- Having financial ties with a supplier, vendor, or competitor without informing the company.
- Making work decisions that benefit family members or friends, like approving contracts or loans.

11. Professional Engagement:

Employees are encouraged to associate themselves with professional bodies to enrich their knowledge and also help in building the HFS brand. However, employees are required to take prior approval of their manager before engaging with any such professional body. Further, such engagement must not result in dereliction of duty or monetary gains or in discrediting the Company's reputation or abuse of its resources.

12. Personal Relationships:

Employment of relatives at HFS will be considered solely on merit and only if there is no possibility of a conflict with the Company's interests. Employees must be aware of how to prevent these conflicts, as well as disclose them to the management if needed. The following aspects need to be considered with respect to managing personal relationships:

- Employees must not supervise, review or have any influence on the evaluation, pay or benefits of a relative.
- Details of relatives of any employee, who are employed by suppliers, customers or competitors and where such relationship is likely to influence decisions / transactions pertaining to the Company, must be disclosed to management.
- Relatives must not take advantage of an opportunity which was sourced through the employee's professional capacity. In questionable situations, employees must seek guidance from their manager.

The term "relative" for the purpose of the above clause will, in relation to an individual, mean including but not limited to spouse or domestic partner, parents, children, siblings, grandparents, grandchildren, in-laws, step-parents, step-children, step-siblings, guardians, sister-in-law, brother-in-law, son-in-law, daughter-in-law.

13. Gifts and Entertainment

Employees must not accept gifts or cash equivalent from vendors, suppliers, customers or any such third party, which will result in any violation of law or commitment to mutual respect. Acceptance of gifts that are in the nature of promotional items with the logo of the other party and / or of nominal value not exceeding Rs. 2,500/ occasional business meals, celebratory events and entertainment, provided that they are not excessive nor create an appearance of impropriety, do not violate this Code.

14. Use of Company Assets

Employees must not exploit Company resources for their own personal gain / monetary advantage. In the discharge of official duties, they must strive for effective and judicious use of resources entrusted to them. Resources include both tangible assets like equipment and facilities etc. as well as intangible assets like designs, information, software, or networks with suppliers / customers, etc.

Each employee has the responsibility to protect Company assets and information - doing so is critical in building and maintaining customer trust and loyalty. Improper or careless handling of assets and information could harm the Company's financial strength and reputation. In addition, these violations could adversely affect a customer's or business partner's decision to engage with HFS.

Employees must judiciously use the Information Technology facilities provided to them. In particular, every employee must note the following:

- E-Mail / Internet facility must not be used for personal gain or commercial use.
- Downloading content from or accessing questionable sites is not allowed.
- Frivolous use of email for transmitting non-work related messages, pictures, jokes, chatting, etc. is prohibited.

15. Bribery and Corruption

Bribery/Corruption is defined as receiving or offering of an undue reward from / to any third party. Employees must note that HFS follows a zero-tolerance approach towards bribery and corruption. Employees must not make / receive any payment to / from anyone, including any government / public servant for the purpose of obtaining or retaining business or for obtaining any favorable action. Any deviant behavior on this aspect will invite strict disciplinary action and HFS will not be liable for any consequences due to such action by any employee.

16. Know Your Customer / Anti- Money Laundering

Employees must exercise requisite care in selecting those with whom they conduct business. While conducting business, Employees must adhere to processes which are in place for checking the credit and character of customers and counter parties. These processes ensure adequate customer due diligence and ongoing monitoring of their transactions. This is also done to detect suspicious transactions during the entire period of relationship.

Money Laundering legislations criminalize money laundering in respect of all crimes including drug trafficking, terrorism, theft, tax evasion, fraud, handling of stolen goods, counterfeiting and blackmail. It is also an offence to undertake and / or facilitate transactions with individuals and entities involved in criminal activities.

17. Political Affiliation

At the workplace, employees must not solicit support for causes not related to the Company. Any kind of political activity and political affiliations are not allowed during work hours.

18. Outside Employment

Employees will not engage directly or indirectly in any other employment, or business of financial interest which conflicts with the interests of the Company.

19. Privacy and Confidentiality

The Organisation has a commitment to ensure the privacy of personal information they have about Employees and customers.

A. Proprietary and Confidential Information

Employees must always ensure the confidentiality of 'Proprietary and Confidential Information' that they obtain or create in connection with their activities for the Company, in accordance with applicable laws. Every employee is obligated to protect HFS's proprietary and confidential information, even after he / she leaves the Company, and he / she must return all proprietary information in his / her possession upon leaving.

For the purposes of the above, 'Proprietary and Confidential Information' includes any system, information or process that gives the Company an opportunity to obtain an advantage over competitors, non-public information about businesses, its customers and employees, or any other information which is not available in the public domain.

The following guidelines must be followed with regards to Proprietary and Confidential Information:

Proprietary and Confidential Information about the Company, its customers, suppliers or distributors, must not be disclosed to anyone (including other employees) not authorized to receive it or with no need to know the information, unless such disclosure is authorized or is required by law, appropriate legal process or appropriate internal authorities.

Intellectual property of the Company such as trade secrets, patents, trademarks and copyrights, business research, new product plans, objectives and strategies, records, databases, salary and benefits data, employee(s) medical information, customer / employee(s) / supplier(s) lists and any unpublished financial or pricing information must be protected.

Unauthorized use or distribution of proprietary information violates our internal policies and is illegal. Such use or distribution may result in negative consequences for both the Company and the individuals involved, including potential legal and disciplinary actions.

B. Customer Privacy

The Company's customer files are confidential and must be accessed only by the employees with a legitimate need for the information. Any customer data should be accessed only by employee authorized to do so.

C. Employee Privacy

All information about employees is confidential and access is limited to those who need the information or as required by any law and regulation, as per court order or when authorized. The Company's record-keeping practices are reviewed periodically to ensure that they are ethical and in accordance with local laws and regulations.

20. Vigil Mechanism/Whistleblower Policy

Whistleblowing is a formal process, designed to encourage and enable employees to report, without fear of retaliation, any unethical, improper, or wrongful practices that could negatively affect the company's reputation or financial well-being.

Employees can report such matters through designated and appropriate channels. An employee who raises such concerns is referred to as a Whistleblower, and the act of reporting is known as Whistleblowing.

Employees should feel free to report matters of wrongdoing to management without fear of any repercussion on themselves. Management provides an assurance that the confidentiality of the Whistleblower is maintained at all times.

Employees must report any instances of breach / violation to the Ethics Team at whistleblower@hfs.in

21. Discipline

Employees are expected to follow the principles and specific actions as required by this Code in letter and spirit. In case of any breach thereof, the respective immediate manager is expected to undertake employee counseling so as to initiate corrective action.

22. Breach / Violation of Code

While HFS believes that its employees realize and appreciate the need to follow this Code in letter and spirit, in the unfortunate incident or act of breach/violation, a corrective and/or deterrent action becomes unavoidable. Therefore, any breach/violation of the stipulations mentioned in the Code will be treated as misconduct, for which appropriate action will be initiated and penalty will be imposed. This penalty, depending upon the nature and seriousness of breach/violation, may range from caution, warning, monetary penalty eg docking of incentives, bonus, increments upto termination of employment.

23. POLICY FOR PREVENTION OF SEXUAL HARASSMENT AT THE WORKPLACE

In view of adhering to the prescribed laws under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013, our Company has framed this policy for prevention of sexual harassment at the Company (“**the policy**”).

This policy applies to all categories of employees of the Company, including permanent managerial or subordinate whether probationers, casuals, temporaries, trainees and employees on contract working for and on behalf of the Company either at its workplace or deputed to work elsewhere including at client sites.

The Company will not tolerate sexual harassment, even if engaged in by clients, customers, vendors or any other business associates.

The Company has constituted an “**Internal Complaints Committee**” for Redressal of sexual harassment complaints (made by a Complainant) and for ensuring time bound redressal of such complaints.

All complaints need to be sent to POSH@hfs.in.

Employees can refer detailed Policy for Prevention of Sexual Harassment at the Workplace.