

## CODE OF CONDUCT

### Introduction:

Finaleap Finserv Private Limited's Code of Conduct will be known as "The Code of Conduct for Members of the Board and Senior Management Personnel\*."

This Code applies to all members of the Company's Directors and senior management. The Meaning and inclusion of the Key Managerial Person will be as follows:

- Director: As defined under Companies Act, 2013.
- Chief Executive Officer (CEO): The highest-ranking executive responsible for the overall management and performance of the company. The CEO is often the face of the organization and sets the company's vision and strategic direction.
- Chief Operating Officer (COO): The COO oversees the day-to-day operations of the company and ensures that business activities align with the company's strategic goals.
- Chief Financial Officer (CFO): The CFO is in charge of managing the company's financial affairs, including financial planning, budgeting, reporting, and risk management.
- Chief Information Officer (CIO): The CIO is responsible for the company's information technology and digital strategies, ensuring that technology supports the organization's objectives.
- Chief Marketing Officer (CMO): The CMO leads the marketing and branding efforts of the company, developing and implementing marketing strategies to promote products and services.
- Chief Human Resources Officer (CHRO): The CHRO oversees all aspects of human resources, including recruitment, training, performance management, and employee relations.
- Chief Legal Officer (CLO) or General Counsel: The CLO is responsible for all legal matters within the company, providing legal counsel and ensuring compliance with relevant laws and regulations.
- Chief Sales Officer (CSO): The CSO leads the sales team and is responsible for driving sales growth and revenue generation.

The goal of this code is to improve the Company's ethical and transparent processes for managing its affairs, and to maintain the shareholders' faith and confidence in the Management.

Finaleap's business methods have been guided by integrity, honesty, fair dealing, and full compliance with all applicable laws from its inception. Since then, the staff have maintained and lived up to this dedication in their daily obligations

The Code of Conduct for Members of the Board and Senior Management Personnel of Finaleap FinServ Private Limited will be known as "The Code of Conduct for Members of the Board and Senior Management Personnel."

All members of the Company's Board of Directors and senior management are bound by this Code.

The purpose of this code is to strengthen the Company's ethical and transparent processes for managing its affairs, as well as to keep shareholders' faith and confidence in management.

Since its foundation, Finaleap's business practises have been guided by integrity, honesty, fair dealing, and full compliance with all applicable laws. Since then, the crew has maintained and upheld this commitment in their everyday duties, and Finaleap's reputation has remained one of its most precious assets.

### **Section 1: Adherence to applicable laws, rules, and regulations**

#### **"At all times, we respect the law"**

Shall be obligated by the law. Never jeopardize compliance with all applicable laws and regulations. Internal rules and regulations must also be followed. Internal regulations are unique to the Company and may go beyond what the law requires.

### **Section 2: Potential for Conflict of Interest**

#### **"We will always operate in Finaleap's best interests."**

Shall not engage in any decision-making process on a subject where a conflict of interest exists or is likely to exist, making it impossible to make an independent judgement of the Company's best interests.

### **Section 3: Extracurricular Activities**

**"We are proud of Finaleap's reputation and always keep Finaleap's best interests in mind when we engage in outside engagements and activities."**

No activities outside of Finaleap should be pursued if they would conflict with Finaleap's responsibilities. In all such cases where activities outside Finaleap are being pursued, it will be informed to Senior Management to maintain transparency

### **Section 4: Optimal Resource Utilization:**

**"Time and Resources are important to us."**

Should attempt to make the best use of available resources. Will take precautions to ensure that costs are appropriate and that no waste occurs.

### **Section 5: Independence and Professionalism**

**"We try to live in spirit rather than letter."**

Shall act with personal and professional integrity, dedication, honesty, good faith, and high moral and ethical standards. They must be self-sufficient in their decisions and behaviors.

### **Section 6: Business Prospects**

**"We are devoted to helping Finaleap grow."**

Shall not compete with the Company, nor shall they take personal advantage of business prospects that they uncover during the course of their employment, so as not to put the Company's operations in direct or indirect rivalry. First and foremost, you must guarantee that these actions do not jeopardize your company's responsibilities.

### **Section 7: Insider Trading**

**"We accept the Insider Trading Rules and adhere to them."**

Should not reveal any Price Sensitive Information/Unpublished Price Sensitive Information that could damage the Company's performance. Noncompliance might result in not only disciplinary action but even criminal proceedings.

### **Section 8: Antitrust and fair dealing**

**"We believe that free competition is essential."**

Shall compete in strict accordance with all antitrust, competition, and fair dealing laws.

### **Section 9: Confidential information**

**"We respect the confidentiality of individuals and value and preserve our own sensitive information."**

Any information that is not or is not yet public is considered confidential information. Trade secrets, business, marketing, and service plans, consumer insights, designs, databases, records, wage data, and any other non-public financial or other data are all included. Unless compelled by law, shall not divulge or enable the disclosure of confidential information. This commitment persists when the employee's job ends.

### **Section 10: Fraud, Asset Protection, and Accounting**

**"We demand honesty and hold the Company's assets and property in high regard."**

Shall not engage in any fraudulent or other unethical behaviour concerning property or assets, or financial reporting and accounting. Will keep Finaleap's stuff safe and utilise it properly and efficiently. Will work to prevent loss, damage, misuse, theft, fraud, embezzlement, and destruction of Finaleap's property. These responsibilities apply to both tangible and intangible assets, such as trademarks, confidential or proprietary data, and information systems.

### **Section 11: Bribery and corruption**

**"Any type of bribery or corruption is unacceptable to us."**

Shall not provide or promise any personal or improper financial or other advantage directly or through intermediaries in order to obtain or retain a business or other advantage from a third party, whether public or private. They cannot take any such benefit in exchange for preferential treatment of a third party. Everyone must avoid any activity or behavior that would create the impression or suspicion of such conduct or an effort at it.

### **Section 12: Discrimination and harassment**

**"We value diversity and respect the human dignity of our coworkers."**

Every employee's personal dignity, privacy, and personal rights will be respected, and a workplace free of discrimination and harassment will be maintained. Shall not discriminate on the basis of race, gender, age, or sexual orientation, or engage in any type of verbal or physical harassment based on any of the foregoing or any other cause.

### **Section 13: Related Party Transactions**

**"We value the trust placed in us by our shareholders."**

Shall not, in his official capacity, engage in business with (a) a relative or (b) a private limited company in which he or his relative is a member or a director, (c) a public limited company in which he or his relative holds 2 percent or more paid up share capital, or (d) a firm in which the relative is a partner, unless otherwise permitted by law.

### **Section 14: Families and Relatives**

**"We shall make objective and fair employment and development decisions."**

Employees' immediate family members and partners may be hired as employees or consultants only if the appointment is based on credentials, performance, skills, and experience, and the employee and his or her relative or partner have no direct or indirect reporting link.

### **Section 15: Failure to comply**

**"We shall consult the Code, abide by its rules, and seek advice when appropriate."**

Shall guarantee that all aspects of this Code are followed to the letter, that the right thing is always done, and that the highest standards of integrity are maintained.

### **Annexure I**

To,  
The Compliance Officer  
Finaleap FinServ Private  
Limited Pune.

Sub : Confirmation of Compliance of the Code of Conduct of Finaleap FinServ Private Limited.

I \_\_\_\_\_(name), \_\_\_\_\_(designation) of the  
Company, do hereby confirm that I have fully complied with the provisions of the Code of  
Conduct of the Finaleap FinServ Private Limited for the Accounting year ending on 31st  
March,20\_.

Signature \_\_\_\_\_

Name \_\_\_\_\_

Date \_\_\_\_\_

Place \_\_\_\_\_

**Note:** to be submitted by 30th April, each year.