

## CODE OF ETHICAL BUSINESS CONDUCT

### Complying with Laws

- **IFIN Global** will act within the law, our licensing and authorizations obligations, and any other regulations.
- **IFIN Global** will conduct our business as responsible corporate citizens and will follow the applicable legal framework of the country in which we operate by the letter of the law and in spirit.
- **IFIN Global** is expected to know and to understand the legal obligations applicable while performing their duties and discharging their responsibilities while performing services. Ignorance cannot be an excuse for violation of law.
- Considering the fact that our businesses are spread over multiple locations, a common approach should be adapted, to the extent possible, in matters that impact us at more than one location.
- Any unlawful means of whatever nature to overcome difficulties in the operation or implementation of legislation is expressly prohibited and discouraged.

### Fair Competition

- **IFIN Global** will be committed to legal and ethical competition.
- **IFIN Global** should not try to secure an advantage by ridiculing the competition.
- **IFIN Global** shall support the development of laws that promote, encourage, or result in, fair competition.

### Acting with Integrity

- ✓ **IFIN Global** must conduct all of their business in an honest and ethical manner.
- ✓ **IFIN Global** to take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all their business dealings

and relationships, wherever they operate, and to implementing and enforcing effective systems to counter bribery.

### **Bribery / Kickbacks / Gift and Hospitality**

- Bribery is an offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust.
- **IFIN Global** will not make any such payments to our clients or any or its directors and/or employees for the purpose of obtaining or facilitating the performance of the **IFIN Global** contract
- **IFIN Global** will be required not to make, and shall not accept, facilitation payments or "kickbacks" of any kind.
- Facilitation payments are typically small, unofficial payments made to secure or expedite a routine action by an official. Kickbacks are typically payments made in return for a business favour or advantage.
- **IFIN Global** must avoid any activity that might lead to a facilitation payment or kickback being made or accepted.
- **IFIN Global** shall also not offer gifts or payments or authorization of payments by way of gifts or pay personally for gifts or hospitality in order to avoid this policy

### **Suspected Fraudulent behavior**

- Any acts of commission or omission which are detrimental to the business of the company i.e., bribery, corruption, fraud, pilferage, theft etc., will be termed as misconduct. Any such suspected fraudulent behavior is liable to be investigated as per process and **IFIN Global** is liable to face appropriate disciplinary action

### **Maintaining Confidentiality of Information**

- ✓ **IFIN Global** will protect the confidentiality of all our clients, its employees, customer information and any other information shared during the empanelment process.

- ✓ Additionally, there is an increasing amount of data protection legislation throughout the world, driven by people's concern that information might be used for the wrong purposes.
- ✓ **IFIN Global** will abide by such applicable Data Protection Laws.

### **Health and Safety**

- ✓ **IFIN Global** will care for the health and safety of the products/services to be rendered vis-à-vis the operations of **IFIN Global** Clients.
- ✓ **IFIN Global** are responsible for making sure that the way they carry out business does not harm the health and safety of their people or anyone else affected by their activities, products or services.

### **Environmental Compliance**

- **IFIN Global** will minimize the potentially harmful effects of our activities on the environment.
- **IFIN Global** are committed to protect and preserve the environment.
- **IFIN Global** will endeavor to reuse rather than dispose whenever possible.
- **IFIN Global** will also promote recycling and the use of recycled materials.

### **Human Dignity**

- **IFIN Global** is committed to protecting and enhancing the human dignity of all those engaged with **our** Clients.

**For IFIN Global Group**

**Name :-** Venu Madhav Gottupulla

**Designation:-** Deputy CEO