CENTRUM HOUSING FINANCE LIMITED

Code of Conduct Policy

Document Title	**Code of Conduct Policy**
Approved by	**Board of Directors at its meeting held on August 6, 2019**
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Centrum Housing Finance Limited (CIN No.: U65922MH2016PLC273826)

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Code of conduct:

1) Ethical Business Practices:

i. The Company expects employees to adopt ethical practices in sales and marketing of productsand services as well as in representing the Company to the statutory / government authorities,vendors, customers and stakeholders.
ii. Every employee shall take possible steps to ensure and protect the interest of the organizationand discharge his/her duties with utmost integrity, honesty, devotion and diligence.
iii. The employee shall not offer directly or indirectly anything of value (such as bribes) to any person to influence a reward or action in favour of the Organization. A business courtesy, suchas gift, contribution or entertainment should never be offered under such circumstances thatmight appear to be improper, nor should the same be accepted by an employee from such agencies or people.

(a) Responsibilities of all Employees relating to the Code of Conduct:

i. Employees should get familiarized with the policies related to their work in detail.
ii. Employees should have a basic understanding of the issues covered by each policy pertainingto their jobs.
iii. Employees should seek assistance and guidance from their immediate superiors when they have a doubt about application of the policies.
iv. Positive aspects of the organization should be focused while interacting with outsiders.
v. Any concern about possible violation of a policy should be promptly reported.

(b) Responsibilities of the Employees:

i. Follow all accounting, reporting and control procedures and policies established by the management.
ii. Be accurate, timely and complete in preparing and maintaining records and reports required by the management.
iii. Before signing a document, make a reasonable enquiry to make sure the information contained in it is accurate and complete.
iv. Before involving the organization in any transaction or releasing any financial information, obtain all required management approvals and adequately document them.
v. Keep records secure, including computer-based information resources.
vi. Take prompt remedial action whenever required.
vii. Promptly report any concerns about possible violations of this policy.

2) Internet and Electronic Mail Usage:

Official internet provided is used strictly for conducting business for the company.
The access has to be used with utmost care.

(a) Internet Access:

Access to the internet is only for business activities and must not be used excessively, or forinappropriate personal use.

i. Web browser software may only be installed and configured by authorized personnel.
ii. The Company retain the Rights to block access to any internet website.
iii. Posting information or participating in debate on the internet in any way that could be construed as acting on behalf of the company and that is prohibited unless an employee is specifically authorized to do so.
iv. Software, including patches must not be downloaded or otherwise copied from the internet. Only the IT team is authorized by the company to install on or download software to an employee's computer.
v. No material of any sort may be copied from the internet to a CHFL PC or server unless it is business related.
vi. All downloads from the Internet must be virus scanned before used on any company's computer.
vii. Visiting and browsing the social networking sites like Facebook, Instagram and twitter, sites of similar nature is prohibited during office hours. Employee should refrain from posting any official information, grievances and opinions on company related issues on such public sites/blogs.

(b) Electronic Mail (E –Mail):

E-mail is only to be used for business related activities and must not be used for inappropriate personaluse.

i. All messages, information and data sent over the Company's computer and telecommunication network are property of the Company.
ii. The Company reserves the right to access, view and disclose any outgoing or incoming e-mail messages for the purpose of ensuring that no material that is either illegal or adverse to the Company or its clients or employee is being produced or transmitted.
iii. All traffic in and out of the company will be subject to monitoring and periodic audit. Users are therefore advised that they have no expectation of privacy for Internet based communications including e-mail.

(c) Further clarification on Internet and Email facilities:

In addition, the company's internet access and e-mail must not be used for any use deemed unethical,illegal or unauthorized either now or in the future, including:

i. Excessive or inappropriate private and personal use.
ii. Any profit - related activity not sanctioned by the company.
iii. Seeking to gain unauthorized access to Internet resources.
iv. Knowingly altering or destroying the integrity of any information.

v. The transmission of any computer ID or password in plain text.
vi. Downloading, transmitting or viewing of pornography and any vulgar, profane, insulting oroffensive message.
vii. Propagating chain mail messages.
viii. Electronic harassment of any kind.
ix. The defamation of, or allegations about, any individual or organization.
x. Copyright infringement
xi. Unauthorized use of the CHFL network or gateway.

The company cannot be held responsible for security of any personal financial transactions entered into by users of the internet facility. An employee should divulge financial information, such as creditcard or bank account numbers only when he/she is confident the security of the site he/she is using.

3) Gift and Entertainment:

Unauthorized receipt, whether directly or indirectly, of any profit, commission or gifts which may be construed as a bribe arising from contacts made during course of employment may be regarded as major misconduct.

Consequently, the company's policy controls the receiving of and giving of gifts or invitations outsidethe company, such as sporting or cultural events, or meals.

Neither employees, nor any member of their family, may accept such gift, entertainment or other favour from customers, vendors and channel partners.

4) Conflicts of Interest:

Conflict of interest is defined as "when an employee's personal interests conflict with the interestsof the organization". The use of one's position to obtain personal gain or advantage for oneself, members of one's family or friends would result in a "conflict of interest" if the organization's reputation is jeopardized in any way, even though there may be no immediate or apparent financial loss to the organization.

For employees act in the best interests of the organization, they or members of their families should not engage in any activity or have any outside interest which might conflict with the organization's interest in any way, be harmful or publicity detrimental to the organization or deprive the organizationof their loyalty, in carrying out its policies and satisfactory performance of their duties.

A conflict of interest is deemed to exist where –

i. An employee holds an outside position which affects the performance of his/her work for the organization.
ii. An employee is an employee of or consultant to any public or private concern which is a competitor or supplier or dealer of the organization.
iii. An employee or a member of his immediate family acquires an interest in a firm which to his knowledge, the organization is investigating or with

which the organization is carrying on or contemplating negotiations for merger, consolidation, acquisition or joint venture.

iv. An employee or a member of his immediate family deals in the organization's stock based on information gained in the course of performance of the employee's duties and notavailable to the public or otherwise misuses information available to or gained by the employee through his employment.

5) Adhering to Code of Conduct:

Compliance of the Code of Conduct is a must. Employees who violate the spirit or letter of these policies are subject to disciplinary action including being discharged from duties.

Broadly, the violation of the code of conduct may be categorized into the following three types:

(a) Personal and Behavioural:

i. Use of abusive and indecent language
ii. Discrimination and bias
iii. Taking undue advantage of organizational position for personal gains
iv. Misappropriating credit for a colleague's effort
v. Demanding personal work from subordinates
vi. Harassment etc.

(b) Integrity: Demonstrating any action resulting in conflict of interest.

(c) Organizational:

i. Non-Compliance of legislation
ii. Improper handling of customer complaints and violation of organization's policy
iii. Requesting others to violate a policy
iv. Failure to promptly report a known or suspected policy violation

However, the above violation of code of conduct is in addition to the misconducts provided in the disciplinary rules, these violations may be read as part of misconduct.