

# Truhome Finance Limited

*(Formerly Shriram Housing Finance Limited)*

## Business Code of Conduct

Truhome Finance Business Code of Conduct is in alignment with its values and commitments. The essence of this code is that each employee should conduct the Company's business in a way that upholds its values and commitments.

This code expects every employee to conduct business with integrity, in compliance with applicable laws, and in a manner that excludes consideration of direct or indirect personal advantage / gains.

It is the individual responsibility of each one of Truhome Finance employees to ensure that all of us are aware of these values, commitments, and procedures, and behave in accordance with the spirit as well as the letter of this code.

Truhome Finance recognizes that it is vital that the behaviour of its employees matches the high intentions and values. Hence, adherence to all the elements of this code and the accompanying principles and procedures is necessary. The principles and procedures in this Code of Conduct apply to all material transactions, large or small, and describe the conduct expected of every Truhome Finance employee.

This guide sets basic Business Conduct Standards for Truhome Finance employees. These standards are presented as clearly and plainly as possible.

It is our goal to continue to build Truhome Finance into a symbol of trust by providing the highest levels of financial and personal integrity and quality customer service. As we build Truhome Finance, and as the world around us continues to change, Business Conduct Standards will help ensure that our shared core values and principles guide our decisions and actions. Business Conduct Standards is an integral element in achieving our business goals and an invaluable resource for every Truhome Finance employee. It is the responsibility of the Management to 'Walk the Talk' and ensure that the Code of Conduct is practiced with sincerity. Examples should be set by the leaders for other employees to follow the Business Code of Conduct.

Employees are obligated to immediately report situations that may violate these values, appear to be unlawful, are potentially dangerous, may disrupt business, may cause disrepute to the Company or could jeopardize the interests of Company in any manner whatsoever. Employees are encouraged to communicate their concerns, as well as ask questions about any ethical issue(s). Employees may note that these Business Conduct Standards apply equally to all persons associated with Truehome Finance, including Agents, Vendors, etc.

**Code of Conduct contains the policy on the following:**

1. Promoting and Implementing Efficiency and Accountability
2. Truhome Finance Delegation of Authority
3. Creating Professional Work Environment
4. Respecting Individuals
5. Alcohol and Drug Free Place
6. Avoiding Conflicts of Interests

7. External Affiliations and Interests
8. Personal Relationship
9. Gifts and Entertainment
10. Financial Transactions
11. Responsibility representing the Company
12. Corporate Communications and Media Relations
13. Personal Communication
14. Government Activities and Communication
15. Political Activities
16. Dealing with Groups Outside of the Company
17. Respecting Outside Group Interests
18. Protecting Important Information and Company Value
19. Protecting Computer and Electronic Resources
20. Privacy
21. Protecting Confidential and Proprietary Information
22. Protecting Company Assets
23. Complying with Laws and Regulations
24. Fair Trade
25. Copyright and Software Compliance
26. Consultants
27. Interpretation

### **Other Incidents to Report**

In addition to the 'Code of Conduct' policies, listed below are some cases that should be reported when observed:

- a violation of any law,
- mismanagement,
- Gross waste or misappropriation of public funds,
- A substantial and specific danger to public health and safety; or
- An abuse of authority, collectively referred to herein as "alleged wrongful conduct."

### ***Promoting and Implementing Efficiency and Accountability:***

Truhome Finances' operating and management philosophy is aimed at promoting efficiency and accountability amongst all staff of Truhome Finance.

Truhome Finance provides staff with the necessary tools to effectively and efficiently capitalize in, and service the markets in which we operate. Truhome Finance Headquarters, while providing fundamental direction and philosophy, holds staff to a high degree of accountability.

Truhome Finance requires all it's staff to operate as efficiently and effectively as possible – providing the highest level of customer service – while adhering to all operational accountability standards of the Company.

### ***Truhome Finance Delegation of Authority:***

The Truhome Finance Delegation of Authority is a management tool to increase financial operations efficiency for the Company.

Delegation of Authority establishes system for corporate financial transactions, accounting, other operational functions requiring specific financial authorities for efficiency and individual employer expense authorities, consultant and vendor procedures and guidelines for employees to use with respect to delegated authorities. To increase efficiency, each Truhome Finance employee is to employ Delegation of Authority to its fullest potential. In return, the Company holds all employees accountable to the procedures and financial thresholds detailed in Delegation of Authority.

### ***Creating Professional Work Environment:***

Truhome Finance is committed to providing a safe, orderly, stimulating, diverse and tolerant work environment. Employees are expected to grant others the same respect, cooperation and dignity they wish for themselves. Since Managers serve as examples for all employees, their actions become those of the Company and they assume additional responsibilities to encourage ethical behavior, make appropriate decisions, and maintain a workplace which honors human dignity, respects individuals, and establishes high professional standards.

**Our work environment extends beyond Truhome Finance offices and into the homes, offices and communities of our clients and customers. It is expected that the same principles guiding a professional work environment at Truhome Finance offices will carry over into our extended environments, both in spirit and letter.**

At Truhome Finance, a similar commitment exists. It is reflected in Business Conduct Standards, and includes legal and corporate requirements. Truhome Finance expects to observe the spirit of Business Conduct Standard's protective measures preventing unlawful discrimination, harassment, and information and security breaches.

### ***Respecting Individuals:***

Combining teamwork and individuality in the workplace provides creative and positive results. Teamwork is key to every operation's success – respecting each employee's individuality is necessary for teamwork to be successful. In respecting the right of individuality, harassment interferes with that right and will not be tolerated.

At Truhome Finance, any type of harassment in the workplace is prohibited. In adherence with the local laws and regulations applicable, it is Company policy that the work environment must be free of all harassment (including sexual harassment) or intimidation.

Harassment, by its nature, results in fear and intimidation, so it is often difficult to report the matter. It is the Company's endeavour, to provide confidential and easily accessible reporting channels for every employee. If an employee feels that they have been subjected to harassment, it's the employee's responsibility to report the matter, without any fear of discipline or adverse actions by management.

### ***Alcohol and Drug Free Place:***

Consumption of Alcohol and / or drugs, subject to following exceptions, at the workplace is prohibited.

- a. specifically prescribed drugs as medication for an ailment;
- b. Consumption of reasonable quantities of alcohol at social occasions / gatherings / functions organized / sponsored by the company, at designated areas only.

Violation of this policy will result in disciplinary action, including termination and disclosure to local authorities.

### ***Avoiding Conflicts of Interests:***

Truhome Finance encourages its employees to actively participate in their communities and to pursue activities of special interest – adding these experiences to the enthusiasm and energy of the work environment. When pursuing these activities and interests, Truhome Finance employees have a duty to exercise personal responsibility for the benefit of the Company and to avoid outside interests that conflict with their primary professional responsibilities and obligations. Any time potential conflict appears, or an employee is concerned that a conflict may develop; the employee should discuss the matter with his/her supervisor.

Below are guidelines for Truhome Finance employees to follow for some of the more common areas of interest conflict:

**External Affiliations and Interests:**

- Ownership, employment or consulting interests, directly or indirectly, or control in any manner resulting in the ability to influence the decision/policy, in any Truhome Finance customer, supplier, service provider, contractor, sub-contractor or competitor (including any supplier, contractor, sub-contractor, service provider of such competitor) should be avoided. Nominal amounts of investments in these companies will normally be permitted. However, employee financial interests should not exceed one percent (of stocks, assets and other interests) of a public company, and ten percent (of stocks, assets and other interests) of any other business. All interests in suppliers, service providers, contractors, sub-contractors, customers or competitors (including any supplier, contractor, sub-contractor, service provider of such competitor), despite their value, must be disclosed in the Conflicts of Interest Compliance Questionnaire.
- External affiliations and interests are encouraged, however, these activities should not be competitive with Truhome Finance business activities, nor should the activity be so substantial that the employee's ability to devote appropriate time and attention to his/her professional responsibilities is impaired.
- Any other activity having potential to affect employee's objectivity and performance or which may reflect negatively on the reputation of Truhome Finance should be avoided.
- Truhome Finance staff may take a position as an outside director of a corporation, with the prior approval of Truhome Finance management as long as the corporation's business does not conflict with Truhome Finance's interests. An employee generally should not act as an officer, partner, consultant, agent, representative or employee of any business organized for profit.

**Personal Relationships:**

At Truhome Finance, relatives for the purpose of this Policy are defined as immediate family members and shall include father, father-in-law, mother, mother-in-law, spouse, brothers, sisters, sons and their spouses, daughters and their spouses.

The relative of an employee will not be considered for employment within the Company. However, if the relative of the employee is already working with the Company before the introduction of this policy, then the relative of the employee should not be posted in the same Branch or Function and reporting to the same Line Manager. The same shall also apply to employees who become related as per the above definition in the course of their employment with the Bank. If employees marry whilst in employment with the organization, the Human Resources Department should ensure that one of the employee is transferred to a different Branch or Function. Employees should be aware of how to prevent these conflicts, as well as disclose them to Truhome Finance management if needed.

- Employees should not supervise, review or have any influence on the evaluation, pay, or benefits of a relative.
- Relatives of any Truhome Finance employee, who are employed by Truhome Finance suppliers, customers or competitors and where such nexus is likely to influence decisions/transactions pertaining to Truhome Finance, should be disclosed to Truhome Finance management.
- Relatives should not take advantage of an opportunity which was learned through the Truhome Finance employee's professional capacity. Anything presenting a conflict or potential conflict for the Truhome Finance employee would probably present a conflict for the employee relatives. In questionable situations, employees should seek guidance from their supervisors.

#### ***Gifts and Entertainment:***

Truhome Finance requires that all gifts and entertainment exchanged is done so in accordance with Business Conduct Standards.

#### ***Benefactor Policy***

- Meal and entertainment gifts do not need to be separately recorded if included on an expense report.
- Truhome Finance promotional items given do not need to be recorded.
- All other gifts must be recorded.
- In case of any doubt, please discuss the matter with Business Head / Functional Head or Chief Human Resource Officer before extending any business courtesy (s)/gift.

#### ***Beneficiary Policy***

- All gifts received by the employee, in excess of INR 2,000 must be reported to Chief Human Resource Officer within fifteen days of the receipt. All gifts in excess of INR 5,000 are required to be deposited with the Company. The Company will deal with these gifts, as appropriate.
- Any employee who receives any gift / business courtesy from a contact, vendor or other party, associated with Truhome Finance within the monetary limits specified below should immediately make a noting of the same in the "Gift Declaration Register" and obtain the signature of his / her Reporting Manager.
  - Any employee who is offered any gift over and above the specified monetary limit or its currency equivalent up to a maximum value of INR 10,000 should obtain guidance and approval from the the Business Head / Functional Head and the Chief Human Resource Officer before accepting such gifts.
  - For gift received worth more than INR 10,000, the Business Head/Functional Head shall refer the case through Chief Human Resource Officer to the MD & CEO for approval. All gifts exceeding the monetary limits specified above can only be retained if approval for the concerned is obtained.
- In case an employee is offered a gift of substantial value that could be construed as a reward or incentive for doing business with a particular company, the employee must politely refuse the gift, explain that Company policy prohibits its retention, and report the incident.

#### ***Cash Gifts***

- Truhome Finance strictly does not encourage giving or receiving money or other cash equivalent as a business gift.
- Gifts which can be construed as a 'Bribe' should not be given / accepted during business dealings. This would include any gift that motivates any individual to do anything that is prohibited by applicable laws and regulations of the region and the regulations of Truhome Finance or any third party involved.

### ***Financial Transactions:***

Employees must comply with financial and securities laws as applicable in the country, as well as laws pertaining to the handling of confidential information regarding financial transactions.

This is especially important when employees have access to sensitive, non-public information – 'Inside information' – about a company's current or future business transactions. Avoiding the appearance of impropriety by understanding the implications of financial transactions before they occur is key to successful compliance. For the protection of Truhome Finance and its employees, all employees are prohibited from using Inside Information in any manner whatsoever.

### ***Insider Trading***

What is Insider Trading? If an employee purchases or sells, directly or indirectly, securities of a public company while in possession of material, non-public price sensitive information, or communicates such information to other individuals who trade, the employee may have engaged in Insider Trading. The law in this area is complex.

Material information is the kind of news that would significantly affect the price of a company's securities or the decision of a person to buy or sell a company's securities. Any information that has not been disclosed to the general public is considered non-public information.

It is the policy of Truhome Finance to maintain the confidentiality of information received by Truhome Finance employees, and to prohibit the use of such information in any manner that would violate any applicable law or that could create an appearance of impropriety. Any Truhome Finance employee who becomes aware of any material, non-public information with respect to any company or the market for its securities is prohibited from taking action for personal, family member or significant other gain, or communicating such information.

### ***Responsibly Representing the Company:***

Truhome Finance's growth potential increases the visibility of the Company, its actions and the actions of its employees. Therefore, it is important that all information about Truhome Finance and its employees and affiliates, be communicated in a way that reflects Truhome Finance goals and objectives. Additionally, all public statements attributed to Truhome Finance and its employees should be carefully considered and personal views be kept separate from Company views.

Below are some guidelines for employees to consider as representatives of Truhome Finance, its partners and affiliates.

### ***Corporate Communications and Media Relations:***

- Employees should not speak publicly for the Company unless specifically authorized by Executive Management.
- If an employee is asked by a media representative to comment on Company business, the request should be directed to the Truhome Finance Corporate Communications Department. If a response would be appropriate from the respective employee, Executive Management must approve the content of the communication.

### ***Personal Communications:***

- Employees should not use Company stationery in communications involving non- Truhome Finance business.
- Employees should not associate the Company with or imply a Company endorsement of personal opinions when communicating or engaging in personal affairs unless authorized to do so by Executive Management.
- When publishing articles, delivering speeches or lectures on business, professional or managerial topics, employees should be clear that they are acting as private individual(s), not as representative(s) of Truhome Finance.

### ***Government Activities and Communications:***

- All government affair activity and communications involving local, state or central governments must be closely coordinated with Executive Management and the Truhome Finance employees having questions about contacts with government officials should contact the Business Head / Functional Head or Chief Human Resource Officer.
- Similar to government activities, if a regulatory or legal body contacts an employee, they should immediately communicate this contact to the Business Head / Functional Head and Chief Human Resource Officer.
- Only individuals designated by Truhome Finance to serve in government relations, compliance or legal capacities or Executive Management are authorized to express the Company's view on legislation, regulations or government actions.

### ***Political Activities:***

Truhome Finance funds and resources are not to be used to contribute to any political organizations or politicians with the intention of obtaining business or an advantage in the conduct of business. Truhome Finance will not use charitable donations as a substitute for political donations.

Where political donations are not permitted under local laws, Truhome Finance shall comply with those laws.

Where local laws do permit political donations, any political donations on behalf of Truhome Finance must be authorized in advance by Truhome Finance Board of Directors who shall maintain a record of all such requests, such record to be regularly reviewed and updated and made available to the Legal Counsel and Internal Audit for periodic review.

Although Truhome Finance does not directly participate in party politics, it does engage in policy debate on subjects of legitimate concern to its business, employees, customers and end users and the communities in which they operate, for example through lobbying.

#### ***Dealing with Groups Outside of the Company:***

Truhome Finance treats all customers, agents and suppliers fairly, honestly and with equity. All employees have a responsibility to translate Company policies and established procedures into practice. In dealing with outside groups and when providing products and services, each employee must make a personal commitment to uphold Truhome Finance's principles and never act in a manner that might create an appearance of impropriety or bring disrepute to the Truhome Finance name in any manner.

Relationships with outside groups must be honest and candid. Business should be won or lost on the merits of Truhome Finance products and services. Employees must never directly or indirectly offer payments or other inducements to a customer to make a sale. Employees must not misrepresent Truhome Finance products and services in advertising, public statements or offerings.

When dealing with suppliers, or when making purchases for Truhome Finance, employees should give fair consideration to all prospective suppliers. Purchasing decisions should be based on objective judgment of the vendor's reliability and integrity, and on the value of the offering.

#### ***Respecting Outside Group Interests:***

Truhome Finance prides its reputation on professionalism, courtesy and success. Making negative remarks about outside groups, or divulging proprietary or confidential information will undermine an employee's reputation and that of the Company's. Such attitudes and actions are counterproductive and may be illegal.

It is the Company's policy in its treatment of competitors not to engage in disparagement, predatory conduct, theft of proprietary information, or interference with existing contractual relationships. In addition, when seeking information about Truhome Finance competitors in matters relating to the marketplace as a means of enhancing the Company's competitive position, information must not be gained through illegal acts or through the sanctioning of illegal acts by others.

#### ***Protecting Important Information and Company Value:***

Through daily professional activities, Truhome Finance employees have access to important, non-public information -including information about customers, electronic data, paper files, as well as business proprietary and confidential information. Truhome Finance employees should take extra care in protecting such information and handle this information properly in order to safeguard against inappropriate disclosure.

Each employee has a responsibility to protect Company assets and information - doing so is critical to building

and maintaining customer trust and loyalty. Improper or careless handling of assets and information could harm the Company's financial strength and image. In addition, these violations could adversely affect a customer's or business partner's decision to engage Truhome Finance.

### ***Protecting Computer and Electronic Resources:***

Truhome Finance will continue to enhance its information technology platform as the Company's business grows. Protecting computer and electronic resources will be vital to the Company's success.

Protecting computer resources will prevent:

- Equipment damage resulting from hazards such as misuse or vandalism
- Inaccurate, damaged, or destroyed data caused by unauthorized access or attempted access to our systems
- Unauthorized access to proprietary, privileged, personal, or sensitive data
- Use of computer resources for purposes other than legitimate Company business
- Use of computer software of outside companies in violation of software agreements and copyright laws.

Truhome Finance relies heavily on computer resources and systems to carry significant amounts of proprietary information -electronic information. Electronic communication is a very common and efficient means for Company day-to-day communication. But this efficient form of communication has opened many privacy, protection and information security issues.

E-mail systems are considered one of the Company's computer resources and should be protected in the same way as any other resource. Whilst reasonable use of the Company's E-mail facilities, for personal purposes, may be permitted, the employee must recognize that the primary use of the e-mail must only be for legitimate Company business. The employee must also realize that all information stored, transmitted, or received on the Company's E-mail system including personal email is considered Truhome Finance property and can be accessed by the Company. Employees sending sensitive material via E-mail should take care to route it only to people with a legitimate need to know. Employees should use the same discretion in writing and sending E-mail as with any written documentation.

Use of the Company's Computer resources for accessing websites carrying objectionable including obscene materials is prohibited. Violation of this policy will be seriously viewed and action including termination of employment can follow.

### ***Privacy:***

Truhome Finance has a commitment to ensure the privacy of personal information about employees and policy holders. Truhome Finance embraces this fundamental belief and protecting this information is more than a Company policy; it is considered a corporate duty and an individual responsibility.

#### ***Customer Privacy***

The Company's files are confidential and may be seen only by employees with a legitimate need for the information. Information will be disclosed to others only as authorized in certain specific circumstances.

### ***Employee Privacy***

Truhome Finance maintains information about its employees. Company record-keeping practices are reviewed periodically to ensure that they are ethical and in accordance with local laws and regulations. All information about employees is confidential and access is limited to those who need the information.

Truhome Finance restricts the release of employee information.

### ***Protecting Confidential and Proprietary Information:***

Truhome Finance entrusts its employees with information about the Company's business activities and plans. Employees must keep this information strictly confidential and employees may not act on proprietary or confidential information for personal gain. Examples of confidential information include new product or product enhancements - release of this information may even violate the local laws and regulations applicable.

Employees should not share proprietary or confidential information with fellow employees unless they are specifically authorized to receive it. Careless discussion outside the Company (in airports and airplanes, restaurants, etc.) about this type of information should not occur.

### ***Protecting Company Assets:***

Each Truhome Finance employee is expected to consciously protect Truhome Finance assets under his/her direct/indirect control and / or knowledge. Any asset or property of the Company should be used so as not to add to the cost of the Company, not to disrupt the business or not to other disadvantage of the Company. Failure to do so may harm the reputation of the Company, create financial liability or loss, and adversely affect other interested parties.

Truhome Finance has adopted certain internal control procedures designed to ensure that the Company achieves reasonable value in the acquisition, use or disposition of its assets. Each employee has the responsibility to ensure that no corporate funds are used for unlawful or personal purposes. In addition, employees should not appropriate for his or her own use, or make available to others, any Company property for non-Company purposes. Each employee must be familiar with procedures applicable to his or her responsibilities relating to the acquisition, use or disposition of assets. Truhome Finance employees must also embrace a philosophy that Company assets are not only tangible items, but also include intangibles which employees may develop or acquire in the course of their work for Truhome Finance including customer or agent lists and contacts, and other information to which employees may have access to as a result of their responsibilities.

Safeguarding Company assets is each employee's responsibility. Misappropriation of assets may constitute an act of fraud against the Company.

### ***Complying with Laws and Regulations:***

Truhome Finance employees must observe all local laws and regulations applicable in the country/region. We must be particularly alert to implications of conduct, and ensure that all Truhome Finance operations, as well as the products and services offered, are in compliance with both the spirit and letter of the law.

Every employee is responsible for reporting any activities that may be questionable. The Company and its employees:

- Will operate and be provided a safe and healthy workplace
- Will treat people with respect and dignity irrespective of their gender, color, caste, location or any physical deformity.
- Will support and comply with applicable human rights and employment equity laws
- Will act in a responsible manner
- Will ensure assets are used in a legal and responsible manner
- Will not engage in illegal and unfair competitive practices
- Will not offer or accept bribes
- Are accountable for all actions

Below are some broad legal compliance areas that all employees must adhere to and respect.

#### ***Fair Trade:***

Fair trade laws are designed to encourage free, fair, and open business competition. Some laws aim to promote competition by prohibiting the elimination or unreasonable restraint of trade through monopoly, agreement or duress. Other laws are designed to prohibit unfair or deceptive commercial acts and practices.

Truhome Finance employees should not attempt to decide for themselves whether specific business conduct is or is not lawful. Truhome Finance employees should consult with their functional head.

#### ***Copyright and Software Compliance:***

Copyright laws prohibit the copying, distribution, use and display of a copyrighted work without the prior permission of the copyright owner. The restrictions apply to software and written material, and extend to making derivative works or compilations of any copyrighted material.

Company policy is to respect copyright and software laws and to observe the terms and conditions of any license agreements to which the Company has agreed. Materials and software used by Truhome Finance should be assumed copyrighted. Copyright laws and Company policy prohibit individuals from making copies of software programs they use at work for their personal use.

#### ***Conflict of Interest and Compliance Questionnaire:***

The Truhome Finance Conflict of Interest and Compliance Questionnaire is used to formally track activities that relate to compliance with laws and regulations. Certain employees are required to file these forms annually. These questionnaires include information about:

Activities that may indicate a conflict of interest,

- Contacts with Govt. employees,
- Securities trading activity that may conflict with laws, regulations or Company policy,
- Compliance with local laws.

#### ***Consultants:***

All consultants Truhome Finance retains should abide by the same business conduct standards as Truhome Finance employees. It is the responsibility of any Company employee retaining a consultant for any purpose to make sure the consultants are aware of Company policies and Business Conduct Standards and abide by all of their provisions.

#### ***Interpretation:***

The aforementioned Business Conduct Standards are inclusive in nature and various circulars or other directions issued by the Management of the Company shall be read along with and constitute a part and parcel of these Business Conduct Standards.

#### ***Whistle Blower Process:***

Truhome Finance believes that the conduct of its employees is fair and transparent at all times and they operate in a manner by adopting highest standards of professionalism, honesty, integrity and ethical behaviour. Truhome Finance is committed to developing a culture where it is safe for all employees to voice their concerns about any unethical practice and any event of misconduct. All employees wishing to raise a concern about any misconduct and unethical practice within Truhome Finance are protected.

Employees are expected to report actual or suspected misconduct or malpractice by a fellow employee or superior to stop illegal and otherwise unethical practice within 30 days of becoming aware of the same. The misconduct or unethical practice could be of the following nature:

- Abuse of authority
- Breach of contract
- Negligence causing substantial and specific danger to public health and safety
- Manipulation or use of confidential application information inappropriately
- Financial irregularities, including fraud, or suspected fraud
- Criminal offence
- Deliberate violation of law/regulation
- Wastage/misappropriation of company funds/assets
- Breach of employee Code of Conduct or Rules
- Any other unethical, biased, favored, imprudent event

No manager, director, department head, or any other employee with authority to make or materially influence significant personnel decisions shall take or recommend an adverse personnel action against an employee in knowing retaliation for disclosing alleged wrongful conduct to an audit committee.

#### ***Report Violations:***

Report violations to the code at [ComplianceOfficer@truhomefinance.in](mailto:ComplianceOfficer@truhomefinance.in)