



CAPRI GLOBAL HOUSING FINANCE LIMITED

Code of Business Conduct Policy

Employee Policy Handbook

Version 4.0

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Department	Human Resource
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Document Contact Details

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Documents History

Version	Date	Annual Review / Amendments	Remarks
1.0	01/04/2014	New Policy	New Policy
2.0	05/10/2020	Amendments	Disclosure of Bank account and Demat Account numbers
3.0	29/10/2024	Amendments	Head of investigation and vigilance has been inducted in the committee
4.0	23/01/2026	Review	Review

This policy shall be applicable to all the employees of CGHFL and employees of all the affiliates / group companies of CGHFL and wherever the term 'CGHFL' is used in the policy shall mean and be construed as CGHFL and it's respective affiliate / group company as the case may be.

1.This Code of Business Conduct

This Code of Business Conduct promotes Capri Global Housing Finance Limited's (CGHFL) philosophy and values and applies to the Organization, Directors, and Employees of CGHFL. The Code is aimed at:

- Promoting honest and ethical conduct
- Enhancing the shareholders' value and all other stakeholders
- Promoting and protecting CGHFL'S Philosophy and Values
- Protecting CGHFL'S confidential and proprietary information
- Compliance with applicable governmental laws, rules and regulations

The Code of Business Conduct including subsequent modifications (the Code) shall be published through the office intranet. All the Employees shall abide by the Code. Board of Directors of various group companies shall oversee the compliance of the Code by the respective Companies.

1.1 Code of Conduct for the Organization

1. Overall Common interest

CGHFL shall continue to be committed in all its actions to benefit the economic development of the nation and shall not engage in any activity that would adversely affect such objective

- Employees are not allowed to share their passwords with anyone else in the company, including co-workers, managers, administrative assistants, IT staff members, etc.
- Employees are not allowed to share their passwords with any outside parties, including those claiming to be representatives of a business partner with a legitimate need to access a system.
- Employees must refrain from writing passwords down and keeping them at their workstations.

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2. Financial reporting and records

CGHFL shall continue to prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards which represent the generally accepted guidelines, principles, standards, laws and regulations of the country. Internal accounting and audit procedures shall fairly and accurately reflect all of CGHFL business transactions and disposition of assets.

3. Enhancing the shareholders' value

CGHFL shall continue to remain committed to act in such manner which leads to enhancement in the shareholders' value. In accordance with the extant rules, regulations and other binding agreements shareholders shall be informed of all relevant aspects of the Group business.

4. Disclosure practices

CGHFL shall continue to adopt such corporate disclosure practices as may be specified by the concerned statutory/regulatory authorities.

In addition to the aforesaid, its mandatory that every employee shall declare / provide all their bank account numbers, demat account numbers (including the demat account number of spouse) to the Culture & Talent Management team. Any changes or additions/ modifications etc. should be intimated to the Culture & Talent Management team. Non- disclosure of these on a timely basis would be considered as breach of policy and may lead to disciplinary action

5. Non-discrimination

CGHFL shall continue to provide equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, sex, age, nationality, disability etc. Employees of CGHFL shall be treated with dignity and in accordance with the Group policy to maintain a work environment free of harassment, whether physical, verbal or psychological.

6. Services and Products

CGHFL shall continue to be committed to creating new industry standards of excellence in client service. The Group shall provide innovative and superior quality client service consistent with the requirements of the clients for their satisfaction. CGHFL shall market its products and services on its own merits and shall continue to remain committed to operating in a healthy competitive environment.

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7. Corporate Opportunity

A Director/ Officer/ Employee must not deprive CGHFL of an opportunity that belongs to the Group, for his/ her own/other's advantage, if he/she is in a position of diverting the corporate opportunity for own benefit or to others, to the detriment of the Group. A Director/ Officer/ Employee must not compete with the Group in respect of any business transaction. If anyone is found violating this rule, it will attract an immediate action against the person.

8. Health, Safety and Environment

CGHFL shall strive to provide a safe and healthy working environment at all its work places and comply, in the conduct of its business affairs, with all regulations regarding the preservation of the environment of the territories it operates in.

9. Corporate Social Responsibility

CGHFL shall continue to be committed to be a good corporate citizen not only in compliance with all applicable laws and regulations but also by actively contributing to various social causes for the common good of the people in the communities in which it operates.

10. Ethics and Compliance Committee

The committee consists of the below members and has been formed to serve as a final arbiter in case there is a violation of the Code by any one.

1. Chief Compliance Officer
2. Chief Risk Officer
3. Head Culture & Talent Management
4. Head- Head- Investigation & Vigilance
5. Senior Vice President- Corporate Litigation
6. Director - Business Strategy

11. Representation of the Group in public domain

The Group recognizes the need of placing the information about its activities in the public domain which shall be made by the authorized Directors/Employees.

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1.2 Employee Conduct

To uphold the image and dignity of the Group, it is desirable that all Employees demonstrate a high degree of conduct and integrity and:

- work with a sense of fair play, impartiality and promptness in disposing of cases and show courtesy and consideration in public dealings, employee interactions either in person or in group interactions;
- by keeping in mind the objectives of the Group, to contribute his/her mite through integrity, dedication and competence;
- respect and uphold the good name of the Organization; treat other employees and clients with fairness, courtesy, respect and without discrimination;
- act honestly, avoiding situations which may give rise to a conflict of interest or the perception of such a conflict;
- carry out their duties in a professional, responsible, and diligent manner, restrain from participating or assisting
- in any activity, which is detrimental to the interest of the Group or is in competition to the interest of the Group.
- not use or influence by virtue of the position held in the Group for obtaining favors of any kind for himself/ herself or any members of family or friends or equivalent person with any constituent/borrower /client/customer;
- be cost conscious and plug all wastes and leakages, to remain competitive;
- not to be negligent or show lack of devotion to duty any time;
- not to show any favoritism or commit any irregularity in assigning contracts awarding contracts to third parties;
- do not participate in politics or stand for elections to any public office
- the employees are prohibited to engage in stock trading activities during the business hours of the company. If employee trades in the shares of any listed entity, he/she shall hold the same for a minimum period of 21 days from the date of purchase of shares. If the employee wants to sale off the shares before the permissible period of 21 days, he/she has to take permission from the Compliance Officer and their functional heads. Non-adherence to the above may lead to disciplinary action.

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2. Conflict of Interest

2.1 Professional Conduct

The Directors/Employees of CGHFL shall always conduct themselves in an honest and ethical manner and in the best interest of the Group. Towards this, the directors/ employees of CGHFL shall endeavour to avoid situations that may lead to an actual or potential conflict between person's private interest and the interest of the Group. While it may be difficult to list all the situations of conflict of interest, the following are illustrative examples of some of the situations, which may constitute a Conflict of interest:

- a Director/ officer/ employee engages in any business, relationship or activity which might detrimentally conflict with the business of the Group
- a Director/ officer/ employee receives improper personal benefits as a result of his official position with the Group
- a Director/ officer/ employee is able to make, influence or benefit from the decisions relating to the transaction

If such and other instances of conflict of interest exist due to any historical reasons, adequate disclosures by the interested employees should be made to the management.

2.2 Minimize Business Risk

All Employees of the Group have an obligation to conduct business within the stipulated guidelines that minimize the risk of development of actual or potential conflicts of interest. Transactions with outside firms must be conducted within a framework established and controlled by the senior management of the Company.

Business dealings of the Group with other parties should not result in "unusual gains" for the latter or for the Employees involved in the deal. "Unusual Gains" refers to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the client or the member(s), or both.

Employees who play any role from the Group's side, in any transaction involving purchase(s), contract(s), or lease(s), must disclose to their Business Head / a member of the senior management of the Group, as soon as possible, the existence of any actual or potential conflict of interest so that the conflict can be resolved/minimized.

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2.3 Gift and Inducements

- Employees shall neither solicit nor accept gifts or any personal benefit in the form of cash or cash vouchers / coupons or in kind from any person or company you may be having official dealings on behalf of the company (like existing/potential client, supplier of goods or services to the Group or from any third party which may have business relations).
- Employees shall not have any sort of financial dealings with their professional colleagues in the form of cash or cash vouchers / coupons or in kind. Any financial transaction with other employee or the family members have to be put on Culture Management team's records and an intimation should be send to the Head-Culture & Talent Management about the same.
- The company can take any disciplinary action up to termination in case we find about any such financial dealings without due intimation / disclosure to Culture Management team.
- Employees must also ensure that none of their family members is the direct recipient of any such gift or benefit.

Company reserves right to take any action against any employee found violating the above, including recoveries and penalties on any such favors taken or loss incurred to the company due to such transactions.

3. Securities Transactions and Insider Trading

Insider Trading involves the improper use of non – public price sensitive information when dealing in securities. Certain Employees are prohibited from engaging in insider trading as detailed in the Code of Conduct for Prevention of Insider Trading.

A Director/Employee of CGHFL and their family members shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about CGHFL which is not in the public domain and thus constitutes insider information. The Director/Employee of CGHFL shall maintain confidentiality of all price sensitive information. Unpublished price sensitive information would be disclosed only to those within the Group who need the information to discharge their duty.

3.1 CGHFL'S Name, Logo and trademarks

A director/Employee shall not use the name of CGHFL, its logo or trademark for personal gain/for the gain of the persons not entitled thereto. A Director/Employee shall remain vigilant against the misuse of the CGHFL name/logo/trademark and shall bring to the notice of the senior management instances of any such violations.

3.2 Responsibility statement

1. Every Director/ Employee of CGHFL shall be responsible for the implementation of and compliance with the Code in his/ her professional environment, be fair and take action not to discriminate, honour confidentiality and strive to achieve more specific professional responsibilities.

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2. CGHFL Culture & Talent Management Department shall monitor the day to day implementation of this Code and shall report instances of violations, if any, to the Compliance Committee

3. The Compliance Committee shall act as final arbiter in case of any established violation and shall suggest remedial/corrective/disciplinary steps.

3.3 Declaration of Adherence of the Code

All the Employees are deemed to have accepted this Code on its publication.

The Directors of various Companies in the Group are deemed have acceded to this Code from the date of placing of this Code in the Board meetings of the respective Companies. The adherence to all the points is mandatory and the company reserves the right to amend or modify the policy at any point required.