

ETHICS POLICY

SelfFin India Financial Services Private Limited

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1. Objective

This Policy sets out the ethical principles and standards expected of SelfFin India Financial Services Private Limited ("SelfFin" or the "Company"), its Board members, officers and employees while carrying out their responsibilities and representing the Company.

The objective is to promote responsible conduct, integrity, sound judgement, compliance with applicable law and a culture in which business decisions are made fairly, transparently and in the best interests of the Company and its stakeholders.

2. Policy Guidelines

A. INTEGRITY

SelfFin's business shall be conducted with honesty, integrity and professional ethics, with due regard to applicable laws and regulatory requirements. Every employee, officer and director is expected to exercise sound judgement in matters involving business ethics and to avoid conduct that could reasonably be regarded as unethical or inconsistent with the Company's standards.

COMPLIANCE WITH LAWS

All employees, officers and directors are expected to understand the laws, rules and regulations applicable to their respective responsibilities. Compliance with applicable legal and regulatory requirements, as well as the Company's internal policies and procedures, is a fundamental requirement of employment and office.

3. Duties and Responsibilities of Independent Directors

An Independent Director shall, in carrying out the role:

- maintain high standards of integrity, independence and professional conduct;
- exercise objective and independent judgement while performing Board responsibilities;
- act in good faith and in the best interests of SelfFin and its stakeholders;
- devote adequate time and attention to Board responsibilities so that decisions are informed, balanced and responsible;
- avoid conduct or circumstances that could impair the Director's independence;
- promptly disclose to the Board any circumstance that may affect or reasonably appear to affect independence; and
- support the Company in maintaining sound corporate governance and ethical business practices.

4. Equal Employment Opportunity

SelfFin is committed to providing equal employment opportunities and expects employment decisions to be based on qualifications, competence, experience, performance and other legitimate employment criteria.

The Company shall not discriminate on the basis of race, religion, colour, national origin, sex, age, disability, veteran or military status, or any other ground protected by applicable law. Sexual harassment and other forms of workplace harassment are prohibited. Employees, officers and directors are expected to comply with the Company's applicable anti-harassment and workplace conduct policies.

5. Environmental Responsibility

SelfFin recognises its responsibility to operate in a manner that is mindful of the environment and the health, safety and quality of life of the communities in which it operates. Employees are expected to support the Company's environmental practices and comply with its Environmental Impact Management Policy.

The Company shall seek to reduce avoidable environmental impacts arising from its operations through responsible use of resources, energy efficiency, waste reduction and other practical measures appropriate to its business.

6. Safety

SelfFin is committed to maintaining a workplace that protects employees and other persons involved in the Company's activities from avoidable occupational hazards and personal injury.

Employees are expected to follow applicable workplace safety requirements, report unsafe conditions and comply with the Company's safety procedures and employee handbook provisions. All Company operations and personnel are subject to applicable workplace health and safety requirements.

7. Fair Dealing

SelfFin is committed to dealing honestly and fairly with customers, suppliers, service providers, business partners and competitors. Employees, officers and directors shall not offer or provide customers or business partners with improper benefits, rewards or items of value that are prohibited by law, Company policy or ethical business practices.

The Company shall compete on the merits of its products and services. Employees must not make false, misleading or disparaging statements concerning competitors or their products and services.

Any comparison between SelfFin's products or services and those of competitors must be factual, accurate and capable of being supported by appropriate evidence. Employees, officers and directors shall not use illegal, deceptive or unethical means to obtain competitive information.

8. Political Affairs

No contribution or use of Company funds shall be made directly or indirectly for political candidates, political parties or political organisations except where such activity is expressly permitted by applicable law and has received the required internal approval.

Employees acting in a personal capacity must ensure that personal political activities are not represented as being undertaken on behalf of SelfFin and do not create an actual or apparent conflict with their responsibilities to the Company.

9. Conflicts of Interest

Every employee, officer and director has a duty to act honestly and in good faith in the interests of SelfFin. Personal, family, financial or outside business interests must not improperly influence, or appear to influence, decisions taken on behalf of the Company.

Any actual, potential or perceived conflict of interest shall be disclosed promptly through the Company's prescribed process. The concerned individual shall not participate in a decision where their personal interest could interfere with objective judgement unless the conflict has been appropriately reviewed and managed. Employees, officers and directors shall also comply with any additional conflict-of-interest, related-party transaction and disclosure requirements applicable to their role.

10. Misuse of Assets or Services; Accurate and Complete Records

Company funds, property, systems, information, facilities and services shall be used only for authorised business purposes. Using Company assets or providing Company services for an unlawful, unauthorised or improper purpose is prohibited.

Employees shall ensure that books, records and business information accurately and fairly reflect transactions, commitments and dispositions of Company assets in reasonable detail. False, fabricated, misleading or artificial entries are prohibited.

No employee shall enter into or support an arrangement that results in an inaccurate record, concealed transaction or other prohibited act. Employees are expected to cooperate fully with internal and external auditors and authorised reviewers of the Company.

11. Improper Influence, Foreign Corrupt Practices and Gifts

No employee, officer or director shall offer, promise, authorise, request or accept any payment, loan, gift, benefit or other thing of value for the purpose of improperly influencing a business decision, obtaining an improper advantage or securing business from a government entity, public official, customer, supplier or other person.

SelfFin shall comply with applicable anti-bribery and anti-corruption laws. Payments or benefits intended to influence an official act or business decision, whether made directly or through an intermediary, are prohibited.

Reasonable and customary business gifts or hospitality may be accepted or offered only when lawful, modest, transparent, infrequent and consistent with Company policy, and only where they cannot reasonably be viewed as an attempt to influence a decision. Gifts or hospitality that create an obligation, are excessive, or are prohibited under applicable law or policy must not be offered or accepted.

Where there is uncertainty regarding a proposed gift, hospitality, payment or other benefit, the employee shall seek guidance from the appropriate compliance or management function before proceeding.

12. Compliance with this Policy

All directors, employees and officers of SelfFin are responsible for understanding and complying with this Policy and for supporting its effective implementation. Managers are also responsible for reinforcing awareness and appropriate conduct within their areas of responsibility.

This Policy applies across organisational levels. Violations may result in appropriate corrective or disciplinary action, subject to applicable law and the Company's employment and disciplinary procedures.

Any waiver of this Policy for Directors shall be considered and approved only by the Board of Directors or such Board-authorised committee as may be permitted under applicable law.

Employees and other covered persons who become aware of suspected violations are expected to report them through the Company's applicable reporting or whistle-blower mechanisms. Retaliation against a person who raises a concern in good faith is not permitted.

This Policy shall be reviewed periodically and updated where required to reflect changes in applicable law, regulation, Company operations or governance practices.