

 Lending simplified. Growth amplified.	CODE OF CONDUCT	Document No: HRD_POL_01
		Version No: 1.4
		Issue Date: 18.12.2024
		Effective Date: 18.12.2024

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REVISION HISTORY:

Issue date	Version no.	Clause revised
15.04.2015	1.0	First issue
01.04.2019	1.1	Format Changed
01.08.2019	1.2	Revision in NeoGrowth Logo
15.10.2020	1.3	Addition of bribe and phone call recording conditions
18-12-2024	1.4	Addition of Scope, Operational Risk compliance and few Clauses

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Objective: The employees of NeoGrowth occupy positions of trust and confidence. Employees are expected to maintain the highest standards of conduct and integrity in the performance of their duties. The behavior of employees and Board Members, both inside and outside the Company, directly impacts its reputation and image. Therefore, all the employees and Board members at NeoGrowth are expected to abide by the same code of conduct

Application & Scope: The Code of Conduct shall apply to all employees and Board Members of NeoGrowth, whether permanent, probationer, temporary, contractual, fixed-term employees, retainers, trainees or such other employees. The CoC outlines the standards of behaviour that all employees of NeoGrowth should be required to adhere with.

The following clauses/rules of Don'ts mentioned are considered/covered under Code of Conduct:

- Threatening, attempting, intimidating or doing bodily harm to another person.
- Using abusive language towards others.
- Unauthorized possession of weapons.
- Making false or malicious statements concerning other employees, supervisors.
- Use of alcoholic beverages or illegal drugs during working hours.
- Reporting for work under the influence of alcoholic consumption or illegal drugs.
- Unauthorized solicitation for any purpose.
- Failure to exercise good judgment, or being discourteous, in dealing with fellow employees, Supervisors, or the general public.
- Making personal comments to male/ female employees
- Wilful insubordination or disobedience, whether alone or in combination with others to any of the lawful and reasonable order or orders of the superiors
- Theft, fraud or misappropriation of company's funds, representation of fraud bills, dishonesty in connection with the employer's business or property.
- Theft of property of another workman / employee within the premises of the company.
- Taking bribe/commission from customer/channel partner/vendor or any other stake holder in the Companies' ecosystem
- Recording phone calls without consent of any of colleague (peer/senior/junior) or customer
- Sharing of Confidential or Company Information on personal email id or to any outsider or unauthorised sharing of it internally.
- Procurement of any data, information, knowledge, process note, product note, policy notes, IPRs from previous employer or external market in an unethical or unjust manner without due permissions and authorizations.
- Any conduct that is sexual in nature and unwelcome, imposed upon and unreciprocated by the recipient
- Repeated failure to fulfil assigned duties, meet deadlines, or deliver on commitments.
- Non-compliance with organizational guidelines, instructions, or processes, demonstrating carelessness, tardiness or a lack of attention to detail.

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- Participating in activities or decisions where personal interests interferes with professional responsibilities or compromises on organizational integrity.
- Acting as an employee, officer, partner, consultant agent, advisor or auditor of any of the supplier, customer, subcontractor or any entity or participating in any vocation, profession, trade or business that conflicts with the company’s obligations whether for gain or otherwise.
- Engaging in actions that violate organizational trust, or causes breach of fiduciary duty
- Misuse of authority or resources for any personal or ulterior gains.
- Engaging in activities that increase operational risk, such as bypassing established protocols, unauthorized sharing of sensitive information, or neglecting mandatory compliance checks or breach of any Organisational policy, including Business Ethics policy, Gift policy etc or fraudulent behaviour
- Non-Adherence to Operational Risk Principles
- Engaging in any employment, business, or commitments conflicting with your obligations to the Company.

These work rules are illustrative and not exhaustive and may include violations beyond this policy for which employees may be disciplined. Other rules are provided by statute, by Administrative Code, and by administrative procedures established by management. Violations of any of these rules observed or intimated through complaints including that as per whistle blower policy would also result in appropriate disciplinary action as per the “Disciplinary Action Process”. Additional work rules may be established by management to meet special requirements of departments or work units or as circumstances require.

Declarations by Employees for following points to be done as applicable for ensuring adherence to Code of Conduct as a control mechanism:

- Personal or family-related ties that may interfere with organizational interests.
- Participating in activities or decisions where personal interests interferes with professional responsibilities or compromises on organizational integrity

Notice of this Code of Conduct to Employees: A copy of this Code of Conduct shall be available on the Intranet and company’s website for the information, reading and strict adherence by all employees and associates of the Company, in all grades and scales across the Company.

All employees shall submit an acknowledgement to the HR Department of having read and understood the Code of Conduct

The policy may be amended modified or supplemented from time to time. Employees are expected to be aware/cognizant of it and adhere to the same.