

SAHAYYA FINSERVE

Code of Conduct for Employees

Document Control

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Revision Log

Version	Description	Author	Designation	Date	Document Owner
1.0	Initial Draft				

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1. Introduction

This Employee Code of Conduct Policy (“Code”) defines the standards of professional and ethical conduct expected from all employees of Sahayya Finserve Private Limited (“SFPL” or “Company”). As a regulated Non-Banking Financial Company, the Company requires the highest standards of integrity, confidentiality, and professionalism in all employee actions.

2. Applicability

This Code applies to all permanent, probationary, trainee, contractual, and temporary employees from their date of joining.

3. Ethical Business Conduct

All covered persons shall act honestly, professionally, and in the best interests of the Company. No employee or Director shall engage in any activity involving fraud, misrepresentation, bribery, corruption, or unethical conduct. All business decisions shall be taken objectively and without improper influence.

4. Regulatory and Policy Compliance

Employees must comply with all applicable laws, RBI regulations, internal policies, and operational guidelines relevant to their roles. Any deliberate non-compliance or circumvention of policy will be treated as misconduct.

5. Conflict of Interest

Employees shall avoid situations where personal interests conflict with the interests of the Company. Any financial, familial, or personal relationship involving borrowers, vendors, competitors, or service providers must be disclosed in writing to the Compliance Officer. Employees shall not engage in outside employment or business activity without prior written approval from the Company.

6. Gifts or Bribes

Employees shall not solicit or accept gifts, hospitality, or benefits that could influence business decisions. Gifts exceeding ₹2,000 in value must be disclosed and may only be retained with written approval. Any attempt to offer or receive bribes or unlawful inducements will result in strict disciplinary action.

7. Confidentiality and Data Protection

Employees shall maintain strict confidentiality of customer data, credit information, internal MIS, financial records, and proprietary information.

Confidential information shall not be disclosed to unauthorized persons during or after employment. Employees must comply with IT security policies and clean desk protocols.

8. Protection of Company Assets

Company assets, including systems, laptops, documents, funds, intellectual property, and data, shall be used solely for legitimate business purposes. Misuse, negligence, or unauthorized access to Company resources is prohibited.

9. Workplace Conduct

The Company is committed to providing a safe, respectful, and inclusive workplace. Discrimination, harassment, intimidation, or abusive behavior will not be tolerated.

Child labour and forced labour are strictly prohibited. The possession or consumption of illegal substances within Company premises is prohibited.

10. Public Representation and Social Media

Employees shall not represent the Company before media, regulators, or public forums unless specifically authorized. Unauthorized use of the Company's name, logo, or confidential information on social media or public platforms is prohibited.

11. Reporting Misconduct

Employees have a duty to report any actual or suspected misconduct, fraud, regulatory breach, or violation of this Code to their Reporting Manager, HR, or Compliance Officer.

The Company shall protect employees who report concerns in good faith from retaliation.

12. Disciplinary Action

Violation of this Code may result in disciplinary action, including warning, suspension, termination of employment, and where applicable, legal proceedings.