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Code of Conduct for Employees

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SATIN CREDITCARE NETWORK LIMITED

CIN: L65991DL1990PLC041796

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INTRODUCTION

Satin Creditcare Network Limited ("SCNL", "Satin" or "the Company") is committed to maintaining the highest standards of integrity, professionalism, and ethical conduct in its business practices. This Employee Code of Conduct Policy ("Policy") outlines the principles and standards of behaviour expected from all employees to foster a culture of trust, fairness, and respect.

All employees, irrespective of level or function, are required to comply with this Policy, which complements applicable laws, regulations, and internal policies. This Policy aims to protect Satin's reputation, promote ethical decision-making, and ensure a safe and positive workplace.

PURPOSE

This document is designed to define and uphold the standards of acceptable behaviour for all internal stakeholders of SCNL. It underscores the importance of ensuring that all actions reflect the company's core values and principles. Furthermore, the document outlines the potential consequences and disciplinary actions that may result from any violations of the code of conduct.

SCOPE

This Policy applies to all employees, including permanent, contractual, part-time, and temporary staff, at Satin Creditcare Network Limited.

CORE PRINCIPLES

Employees of Satin shall observe the following core principles:

- **Integrity and Honesty**
 - Conduct business in a fair, honest, and transparent manner.
 - Avoid any falsification or manipulation of records, accounts, or information.
 - Refrain from engaging in any fraudulent or corrupt practices.
- **Compliance with Laws and Regulations**
 - Comply with all applicable laws, regulations, and guidelines governing our business and/or profession.
 - Report any non-compliance or illegal activities promptly through the prescribed channels.
- **Professionalism**
 - Maintain a high standard of professionalism and deliver quality work.
 - Meet assigned deadlines and commitments responsibly.
 - Avoid any behaviour that could tarnish the Company's image or cause harm to colleagues or stakeholders.
- **Gifts and Entertainment**

- Employees shall neither offer nor accept gifts, favours, or entertainment that could influence, or appear to influence, business decisions or create a conflict of interest.
- Acceptable gifts are those of nominal value, customary in business practice, and given transparently; excessive or frequent gifts must be declined or reported.
- Invitations to events or entertainment paid for by third parties must be reported and approved by the employee's manager or the Compliance Officer before acceptance.
- Cash or cash-equivalent gifts are strictly prohibited.
- **Bribery & Corruption**
 - Satin maintains a zero-tolerance policy towards bribery and corruption in any form.
 - Employees must not offer, promise, authorize, or accept bribes, kickbacks, or other improper payments to or from any party, including public officials, customers, vendors, or competitors.
 - Facilitation payments or 'grease payments' to expedite routine administrative processes are prohibited.
 - Any solicitation or offer of improper payments must be reported immediately through the designated channels
- **Discrimination & Harassment**
 - SCNL is committed to fostering a workplace environment free from discrimination, harassment, and any form of intimidation.
 - Every employee has the right to be treated with dignity and respect, and to express their individuality without fear of unfair treatment or hostility.
 - The Company encourages employees to report any concerns related to harassment—including sexual harassment—or intimidation in a safe and confidential manner.
 - Robust and accessible reporting channels are available to ensure that employees can raise issues without fear of retaliation or adverse consequences.
- **Lobbying**
 - All lobbying activities on behalf of Satin must be conducted transparently, ethically, and in compliance with applicable laws and internal policies.
 - No employee shall engage in lobbying or advocacy efforts relating to government policy, legislation, or regulation unless expressly authorized to do so by senior management.
 - Records of lobbying actions must be maintained accurately to ensure accountability.
- **Information to Media**
 - Only authorized spokespersons are permitted to communicate with the media or public on behalf of Satin.
 - Employees must not disclose confidential or non-public information to the media, analysts, or any external parties without proper authorization.
 - All inquiries from the media or public related to Satin should be promptly directed to the Corporate Communications department.
- **Fair Dealing**
 - Satin is committed to dealing fairly and ethically with customers, suppliers, competitors, employees, and other stakeholders.
 - Employees shall not take unfair advantage through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair practice.
 - Compliance with all applicable competition and antitrust laws is mandatory.
 - Respect intellectual property rights and proprietary information belonging to others

- **Insider Trading**

- Employees must strictly adhere to the Company's Code of Conduct for Prevention of Insider Trading.
- Any sale or purchase of SCNL shares must comply with this Code and relevant insider trading regulations.
- Before transacting in the Company's shares on the market, employees are required to obtain prior clearance from the Company Secretary.
- Failure to obtain such clearance will be considered a violation of the Company's insider trading policy and applicable regulatory provisions.

- **Confidentiality and Data Protection**

- Confidential information includes but is not limited to:
 1. All non-public information related to Satin's business strategies, operations, financials, products, services, technologies, and internal discussions.
 2. Information about our customers, including personal and sensitive data obtained during the course of business, regardless of the source.
 3. Any intellectual property, trade secrets, or proprietary information that belong to Satin or its clients.
 4. Employee records, remuneration details, medical information, and other personal employee data.
- Confidential information must only be accessed or used for legitimate business purposes related to Satin's operations.
- Personal information of customers or employees must be processed strictly in compliance with Satin's internal policies, standard operating procedures, and all applicable privacy laws and regulations such as the Information Technology Act, 2000 and the Personal Data Protection Bill, as applicable.
- Appropriate technical, physical, and organizational safeguards must be employed to prevent unauthorized access, disclosure, alteration, or destruction of confidential information.
- Employees should exercise caution to prevent accidental disclosure of confidential information, including when discussing sensitive information in public or semi-public areas.
- Confidential or proprietary information acquired through employment or association with Satin must not be used for personal gain or for the benefit of any third party.
- Employees must not share confidential information with family, friends, or colleagues who do not have a legitimate business reason to access such information.
- Any suspected breaches or incidents involving confidential information must be reported immediately to the Compliance Officer or the designated authority.
- Employees must comply fully with Satin's data protection policies, including secure handling of documents, electronic files, passwords, and access controls.
- Participate in periodic training sessions on confidentiality, privacy, and data protection provided by the Company.

- **Conflict of Interest**

- Avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company.
- Disclose any actual, potential, or perceived conflicts of interest to the reporting manager or Compliance Officer.
- Do not use Company resources or information for personal gain.

- **Respect in the Workplace**

- Treat all colleagues, clients, suppliers, and stakeholders with dignity, respect, and fairness.
- Promote a healthy, harassment-free, and inclusive workplace.
- Refrain from discrimination, bullying, or any form of abusive behaviour.

- **Use of Company Assets**
 - Use Company assets, including computers, email, vehicles, and office supplies, responsibly for business purposes.
 - Avoid any misuse, theft, or wastage of Company resources.
- **Whistleblowing**
 - Whistleblowing is a formal process that enables employees to report any wrongdoing, unethical behaviour, or improper practices without fear of reprisal.
 - This process helps protect the Company's reputation and financial integrity by ensuring issues are raised through the appropriate channels.
 - Employees are expected to follow the Whistleblower Policy as approved by the Company's Board of Directors.
- **Health, Safety, and Environment**
 - Follow all health, safety, and environmental policies and procedures.
 - Cooperate in creating and maintaining a safe and healthy work environment..

ROLES & RESPONSIBILITY

- **Employees**
 - Understand, comply with, and promote this Code of Conduct.
 - Report any observed violations or unethical behavior promptly and responsibly.
- **Managers and Supervisors**
 - Lead by example and ensure their teams understand and adhere to this Policy.
 - Address concerns or reports of misconduct in a timely and confidential manner.
- **Compliance Officer**
 - Oversee implementation and enforcement of this Policy.
 - Provide guidance on ethical dilemmas or interpretations of the Code.
 - Ensure training and communication on the Code are conducted periodically.
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REPORTING MECHANISMS & WHISTLEBLOWER PROTECTION

Employees are encouraged to report concerns about violations of this Policy or any unethical conduct via the following channels:

- Direct Manager or Department Head
- Human Resources Department
- Compliance Officer
- Dedicated Whistleblower Hotline / Email: [whistleblower@satincreditcare.com]

Satin ensures that no retaliation or adverse action will be taken against any employee who reports concerns in good faith.

DISCIPLINARY ACTIONS

Violations of the Code may result in disciplinary action, including but not limited to warnings, suspension, termination, or legal action based on the severity of the violation.

REVIEW & AMENDMENTS

This Policy shall be reviewed periodically and updated as necessary to align with changing laws, regulations, and business practices.

