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Code of Conduct (CoC) Policy

NAVIGATING INTEGRITY: OUR COMMITMENT TO ETHICAL
EXCELLENCE



**PATTAMBI INVESTMENTS
& LOANS (P) LTD**

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Code of Conduct (CoC)

Pattambi Investments and Loans Pvt Ltd

1. Introduction

The Code of Conduct (CoC) of Pattambi Investments and Loans Pvt Ltd outlines the principles and standards of behavior expected from all employees, management, and stakeholders. This Code ensures that our operations comply with applicable laws, regulations, and ethical standards in line with the guidelines established by the Reserve Bank of India (RBI) for Non-Banking Financial Companies (NBFCs).

2. Commitment to Ethical Standards

- **Integrity and Honesty:** All employees must conduct themselves with integrity and honesty in all interactions, ensuring that their actions reflect positively on the company.
- **Transparency:** We are committed to transparency in our dealings with clients, regulators, and stakeholders. This includes full disclosure of information and practices that impact our operations.

3. Compliance with Laws and Regulations

- Employees must adhere to all applicable laws, regulations, and company policies, including those set forth by the RBI, the Companies Act, and other regulatory bodies.
- Non-compliance will result in disciplinary action, including termination of employment.

4. Customer Focus

- **Respect and Fair Treatment:** Every customer should be treated with respect, courtesy, and fairness, regardless of their background or financial status.
- **Confidentiality:** Employees must protect the confidentiality of customer information and avoid unauthorized disclosure of sensitive data.

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5. Professional Conduct

- **Respectful Workplace:** All employees must maintain a respectful workplace free from discrimination, harassment, and retaliation.
- **Professionalism:** Employees are expected to maintain a high level of professionalism in their interactions with colleagues, clients, and other stakeholders. This includes dressing appropriately, being punctual, and demonstrating a positive attitude.

6. Conflict of Interest

- Employees must avoid situations where personal interests conflict with the interests of Pattambi Investments and Loans Pvt Ltd.
- Any potential conflicts of interest must be disclosed to management for resolution.

7. Anti-Corruption and Bribery

- **Zero Tolerance Policy:** Pattambi Investments and Loans Pvt Ltd has a zero-tolerance policy for bribery and corruption. Employees must not engage in or facilitate any form of bribery, whether direct or indirect.
- **Gifts and Hospitality:** Employees must not accept gifts, favors, or hospitality that could influence their decision-making or create a sense of obligation. Any gifts received should be reported to the management.

8. Responsible Lending Practices

- We commit to fair and responsible lending practices that ensure customers are informed of the terms and conditions associated with loans.
- Loan assessments must be conducted objectively, considering the borrower's capacity to repay without causing financial distress.

9. Anti-Money Laundering (AML) Compliance

- All employees must adhere to the company's AML policies and procedures, including Know Your Customer (KYC) norms and reporting any suspicious activities to the appropriate authorities.

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10. Social Responsibility

- **Community Engagement:** We recognize our role in the community and are committed to engaging in corporate social responsibility initiatives that contribute to societal development.
- **Environmental Sustainability:** Employees are encouraged to participate in sustainable practices that minimize the company's environmental impact.

11. Whistleblower Protection

- Employees are encouraged to report any unethical behavior, misconduct, or violations of this Code without fear of retaliation. Whistleblower reports will be treated confidentially and investigated thoroughly.
- The company prohibits any form of retaliation against individuals who report concerns in good faith.

12. Implementation and Compliance

- Each employee is responsible for understanding and complying with this Code of Conduct. Training and resources will be provided to ensure adherence to these standards.
- Any violations of the CoC will result in disciplinary action, which may include termination, legal action, or reporting to regulatory authorities.

13. Review and Amendments

- This Code of Conduct will be reviewed periodically and may be amended to comply with changes in regulations, business practices, and organizational values. Employees will be notified of any significant changes.