



CODE OF CONDUCT FOR EMPLOYEES

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1 Code of Conduct

1.1 PREAMBLE & OBJECTIVE

Preamble

Moneyboxx Finance Limited (or 'Company') is committed to conducting its business in accordance with the applicable laws, rules, and regulations and with highest standards of Corporate Governance guided by sound ethical values. This code is intended to provide guidance in recognizing and dealing with ethical issues, provide mechanisms to report unethical conduct, and to help foster a culture of honesty and accountability. It defines the standards of conduct that is expected of all employees in order that the right decisions are taken in performing roles and responsibilities across all functions in the company. The code is intended to be the charter for day-to-day work to enable employees to make the right decisions and, therefore, serves to following:

1. Underline the fundamental commitment to compliance with regulatory guidelines and laws of the land.
2. Set forth basic parameters of ethical behaviour, and
3. establish a system for detection for reporting of known or suspected or ethical or violations of regulations or code of conduct.

It is every employee's responsibility to read this code as well as all the other related policies in order to remain aware at all times of the procedures, regulations and other requirements that are relevant or pertaining to their association or function with the Company. This code supersedes all previous policies and documents relating to the company's 'Code of Conduct'

Objective

1. **Clarify Expectations:** Define acceptable standards of professional conduct, performance, and interpersonal behavior.

2. **Protect Assets & Reputation:** Safeguard the Company's physical, intellectual, and reputational assets.
3. **Enable Reporting:** Establish transparent mechanisms for employees to raise concerns, report misconduct, and seek guidance—without fear of retaliation.
4. **Promote Accountability:** Ensure that all employees understand their personal responsibility to act ethically and comply with Company policies and the law.

Scope

This Code applies to all Moneyboxx employees and any of its subsidiaries, including:

- Permanent, probationary, and temporary staff
- Contract employees, interns, and consultants
- Branch, regional, and head-office personnel
- Employees must also comply with any additional policies that govern specific business lines or jurisdictions (e.g., POSH).

1.2 Employee Conduct & Discipline

1.2.1 Working Days & Hours

- **Head/Regional Offices:** Monday–Friday; (9:30 AM–6:30 PM, includes 45 mins of lunch and snacks break)
- **Branches:** Monday – Friday; (9:00 AM – 6:00 PM, includes 45 mins of lunch and snacks break)

Saturday (3rd, 4th & 5th): (9:00 AM – 4:30 PM; includes 45 mins lunch & snacks break)

- Employees working from home must take approval from line manager and HR as guided by the Work from home policy.
- Any deviations (e.g., holiday adjustments, business exigencies) will be communicated by HR in advance.
- **Attendance:** Employees must mark attendance via the HRMS/Biometric system at the start and end of each workday. Failure to do so may lead to payroll discrepancies or disciplinary review unless approved by the reporting authority.

1.2.2 **Dress Code & Personal Presentation**

- Maintain a professional appearance that reflects positively on Moneyboxx.
- **Office Attire:** Smart formals, Company-branded T-shirts, neat denims or chinos, and shoes, clean sneakers are acceptable (e.g., collared shirts, western dresses, salwar, saree, formal shoes/sneakers)
- **Casual Day:** Company-branded T-shirts or polo shirts, neat jeans or chinos, and clean sneakers are acceptable, as designated by your manager
- Ensure clothing is clean, pressed, and free of offensive logos or messaging

We trust you to use your discretion and judgement while representing Moneyboxx to the external world

1.2.3 **Identification & Access**

- Wear your Company ID badge visibly at all times within premises and during customer visits
- Do not lend or share your badge; report lost or stolen badges immediately to Admin/HR

1.2.4 **Workplace Discipline**

- Behaviors such as chronic tardiness, unapproved absences, insubordination, unauthorized absence, abandonment of duties or disrespect toward colleagues will result in progressive disciplinary action—from verbal warnings to termination, depending on severity.
- Maintain office cleanliness: dispose of trash, keep workspaces tidy, and adhere to recycling and waste-segregation guidelines.

1.3 **Confidentiality, Liability & Indemnity**

1.3.1 Definition of Confidential Information includes, but is not limited to:

- Client and vendor lists, contracts, and correspondence
- Financial statements, forecasts, budgets, and proprietary models
- Marketing plans, roadmaps, and strategic initiatives
- Intellectual property (software code, technical designs, trade secrets)
- Employee personal data, salary structures, benefits, and performance reviews

1.3.2 **Duty of Non-Disclosure & Limited Use**

- Employees must not disclose confidential information to any unauthorized person inside or outside the Company, during or after employment, without express written consent from an authorized officer.
- Use confidential information only for legitimate Company purposes; personal use or financial gain is strictly forbidden.

1.3.3 Performance & Improvement Plans

- Performance Management exercise in Moneyboxx Finance Ltd. is divided in three Parts:
 - KRA Planning Stage (Establish Evaluation Criteria)
 - KRAs is approved by its Reporting Manger. This exercise is normally initiated in the month of joining or at the start of the year
 - Annual performance Appraisal: This exercise is undertaken at the beginning of every financial year where an employee does a self-evaluation and the Reporting Manager appraises the performance of the individuals

We follow the bell curve for performance appraisal ratings. As an organization we keep introducing plans to augment the performance to the expected performance levels set by the Management and an employee shall duly take part in said plans in a positive manner and undergo any training or program which may be mandated for the improvement without any reservations. In case, an employee fails to show improvement, the company reserves the right to pre-determine (terminate) the services.

1.3.4 Remuneration Secrecy

- Salaries, bonuses, commission structures, and other benefits are personal to each employee and must not be shared or discussed with colleagues or external parties.
- Violations of this secrecy provision may lead to disciplinary action, up to and including termination.

1.3.5 Secure Handling & Storage

- Store paper documents in locked cabinets and shred obsolete confidential materials.
- Use approved encryption for sensitive digital files; never transmit unencrypted confidential data via personal email or unsecured messaging platforms.
- Lock computer screens when unattended and use complex passwords that are changed periodically.

1.3.6 Limitation of Liability & Indemnity

- The Company is not responsible for personal losses incurred due to an employee's breach of this Code (e.g., unauthorized disclosures, loss of personal data).
- Employees agree to indemnify the Company for any damages, fines, or legal costs arising from their willful or negligent breach of confidentiality or other provisions of this Code.
- Employees agree to indemnify the company for any loss/damage arising out of prior employment or for sharing their personal data to a third-party partner in order to fulfil or satisfy the regulatory/statutory requirements related to the contract of employment.

1.4 Conflicts of Interest

A conflict of interest exists when personal, financial, familial, or other external interests interfere—or appear to interfere—with an employee’s ability to act in Moneyboxx’s best interests. It will also include -

1. When an employee takes action or has interests that may make it difficult to perform employee’s work objectively and effectively.
2. Any outside business activity that detracts an individual's ability to devote appropriate time and attention to employees responsibilities towards the Company.
3. Any undisclosed / unauthorized association of an employee outside the Company, from which any kind of economic benefit has been derived either by the employee directly or indirectly.
4. You shall not take up any assignment, employment, or consultancy, whether full-time or part-time, with any other organization that may cause a conflict of interest with your role at the Company, without obtaining prior written approval from the management.
5. Accepting of unauthorized benefits by a member of employee’s family as result of employee’s position in the company.
6. Representing Moneyboxx Finance Ltd. in any transaction in which the employee has personal financial interest.
7. Accepting non-nominal gifts or excessive entertainment (i.e., value more than Rs. 5,000/-) within a year by any employee from any person with which the Company has past, current, or prospective business dealings must be reported in writing to the management.
8. It shall be noted that;
 - a. Employees must not misuse office equipment or facilities for personal benefit.
 - b. An employee may not use a friend, family member, or other entity for purposes of circumventing this conflict-of-interest policy.

The employee should be scrupulous in avoiding 'conflicts of interest' with the Company.

In case there is likely to be a conflict of interest, employee should make full disclosure of all facts and circumstances thereof to the Company and shall proceed with only after prior written approval is obtained.

Disclosure & Approval Process

- Any potential conflict must be disclosed in writing to HR and the employee’s manager as soon as it arises.
- HR will evaluate the disclosure and, if appropriate, impose restrictions (e.g., recusal from certain decisions) or grant a formal waiver.
- Failure to disclose a known conflict constitutes a violation and may lead to disciplinary action.
- Direct or distant relative hiring must be disclosed in writing to HR and the Functional Head at the time of referral or during the initiation of hiring.

1.5 Insider Trading and Dealing in Securities

Employees of Moneyboxx Finance Ltd. may, during the course of their duties, come into possession of Unpublished Price Sensitive Information (UPSI) related to the Company, its operations, clients, associates, or business decisions. As per the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, any employee in possession of such information is considered an Insider.

As an Insider, an employee must not:

- Trade in the securities of Moneyboxx Finance Ltd. or any related entity while in possession of UPSI;
- Disclose or communicate UPSI to anyone except when required for legitimate business purposes, and with proper authorization;
- Advise, assist, or induce others to trade in the Company's securities based on such information.

All employees are required to comply with the Company's Insider Trading Policy, SEBI regulations, and any guidance issued by the Compliance Officer. Breach of these obligations will result in disciplinary action and may attract regulatory or legal consequences.

1.6 Personal Integrity

At Moneyboxx Finance Ltd., we believe in treating each other with respect and fostering an atmosphere of caring, open communication and sincerity. Each of us has a direct role in keeping the company's records accurate and in protecting whatever Company assets we use or manage. Our employees and those representing us, including agents and intermediaries, shall not, directly, or indirectly, offer or receive any illegal or improper payments or comparable benefits that are intended or perceived to obtain undue favours for the conduct of our business.

1.7 Equal Employment Opportunity

Moneyboxx Finance Ltd. is committed to fostering a workplace that provides equal opportunities to all employees and applicants. Employment decisions at every stage—recruitment, promotion, training, compensation, and separation—are made purely on the basis of merit, performance, and business needs.

Discrimination or harassment based on race, caste, color, religion, gender, age, national origin, marital status, sexual orientation, disability, or any other status protected by applicable law is strictly prohibited. All employees are expected to uphold these values and report any violation of this principle through the appropriate grievance or whistleblower channels.

1.8 Roles, Responsibilities & Company Property

The reputation of our Company, the quality of our work-place experience, and the satisfaction of our obligations to shareholders depend on each employee achieving these levels of conduct. Employees are expected to be sincere and perform their duties towards Moneyboxx Finance Ltd. in a standard and qualitative manner.

Employees should keep accurate and complete records of company's transaction. Transactions between Moneyboxx Finance Ltd. and third-party individuals and organizations must be promptly and accurately recorded in accordance with generally accepted accounting principles and practices. No one must ever misrepresent facts or falsify records. All reporting must be accurate, honest, timely, and a fair representation of the facts.

Any equipment, system, and software provided by the Company are for the business purposes only. Permitted exceptions include incidental personal use such as personal email, letters, and phone calls. Moneyboxx Finance Ltd. may review and disclose all information stored on or in any Moneyboxx Finance Ltd. equipment or furniture at any given point of time. Any illegal or unauthorized use of the same, will subject the employee to disciplinary action including legal action. Employees must take due care of all Company property. Any intentional or negligent damage may result in disciplinary action and recovery of costs.

As a Company policy workplaces shall be drug-free. Employees shall not unlawfully manufacture, distribute, possess, use, or be under the influence of prohibited substances at any time on company premises, while company business, or while driving vehicles owned, rented, or leased by the company. The Company shall not be liable for personal losses or unauthorized employee actions. Employees are individually accountable for adhering to policies and applicable laws.

1.9 Ethical Conduct at Workplace

Employees are responsible for preserving objectivity and independence and for acting with integrity at all times at work-related functions. We respect privacy and do not wish to pass judgment on activities outside of work unless they:

- Are carried out in working hours.
- Use company property or resources.
- Concern company information or experience
- Involve payment from a competitor or organisation that consorts with client.
- Result in personal financial gain resulting indirectly from company information.
- Damage company's reputation in any way.
- Render, you unfit for engagement.

The company expects absolute integrity from its employees and will not compromise on the same in any form. Zero Tolerance to wilful indulgence in unethical practices

- Misuse of company Assets/ Funds.
- Misuse of customers money in any form.
- Misusing / Taking advantages of Functional procedural lapse (If any).
- Company will not hesitate to take strict disciplinary action even criminal proceedings against such employees.
- Hiding information in any form regarding any unethical practices/activities in branch will also constitute unethical practice on the employee's part.
- It is duty of every employee of the branch /Location to bring to the notice of higher authorities if any unethical practices or activities going on in the branch/location.

1.10 Guidelines for Company Events and extended workplace

Extended workplace basically consists of any place visited by the employee arising out of or during the course of employment. This includes office premises, seminars, conferences, business trips, company events, Team/company off-sites, transport services provided by employer (if any), digital platforms and mediums used for official and unofficial communications and meetings. All employees are expected to maintain highest standard of ethical behaviour at such venues and follow the Code of Conduct policy at all times.

1.11 Guidelines on Alcohol, smoking, and substance abuse at workplace

Moneyboxx Finance Ltd.. has a responsibility to take all practical measures and reasonable care for the health and safety of all employees. Employees are not permitted to be under the influence of alcohol/any other substance during working hours or while visiting customers or clients. The following guidelines apply to all staff and if breached, concerned employee will be subject to disciplinary procedure.

1.11.1 **The use of alcohol at work and extended workplace.**

- It is regarded as gross misconduct to be under the influence of alcohol at work or extended workplace unless it is a company sponsored event.
- It is strictly forbidden to come to work under the influence of alcohol.
- It is strictly forbidden for any employee to bring alcohol in company premises for consumption during working hours and/or for consumption on the company premises at any time.
- Company sponsored functions or events. Management must approve the consumption of any alcohol if any during such events. Employees are expected to refrain from excessive alcohol consumption while conducting business at company sponsored or work-related functions.
- At Moneyboxx Finance Ltd.. sponsored events, practical and suitable steps can be taken by Managers to ensure the safety and welfare of employees.

1.11.2 **Drugs usage at Workplace**

It is a criminal offence to use, possess, or deal in any controlled substances. Anyone caught in Moneyboxx Finance Ltd. premises involved in any of these activities will be terminated for gross misconduct. Moneyboxx Finance Ltd. reserve the right to call the Police if necessary. Anyone convicted outside work of any offence in connection with controlled substances may also be dismissed. Matters such as the nature of the conviction and the sentence and how the conviction affects the employee's ability and company's reputation will be taken into account.

1.11.3 **Smoking inside Office Premises**

Employees are not permitted to smoke/chew tobacco in any part of the office at any time during business hours. Smoking/chewing tobacco in the premises will be a breach of the Health and Safety regulations. However, if you wish to take a smoking break, you may do so reasonably in the designated smoking area.

1.11.4 **Management responsibilities**

Management is not expected to diagnose alcohol/other substance misuse but do have a responsibility to identify impaired work performance and, where appropriate, encourage the employee to seek assistance.

If the employee is suspected to be under the influence of alcohol/drugs at work, company has the right to direct the employee for appropriate medical/drug tests.

1.12 **Raising Concerns**

We encourage our employees, customers, suppliers, and other stakeholders to raise concerns or make disclosures when they become aware of any actual or potential violation of our Code, policies, or law. We also encourage reporting of any event (actual or potential) of misconduct that is not reflective of our values and principles. The reporting and raising concerns under this Code will be kept strictly confidential. Avenues available for raising concerns or queries or reporting cases could include:

- a. Immediate line manager should be the first point of contact for most cases
- b. Human Resources department/ Functional Head

c. Compliance Officer

In case a concern/issue raised falls under Moneyboxx Finance Ltd.'s 'Whistle Blower Policy' and/or 'Policy on prevention of sexual harassment at workplace' of the company, it shall be dealt as per respective policy (as may be amended and/or supplemented from time to time).

We do not tolerate any form of retaliation against anyone reporting legitimate concerns. Anyone involved in targeting such a person will be subject to disciplinary action. If you suspect that you or someone you know has been subjected to retaliation for raising a concern or for reporting a case, we encourage you to promptly contact your line manager or the Human Resources department.

In a situation, where an employee feels that raising a concern with their line manager or functional heads or HR department will lead to partial or biased outcomes, then such employee may also write to compliance@moneyboxxfinance.com for escalating the matter to a relevant higher authority.

Any decisions pertaining to investigation of a concern raised by employee(s) shall be taken by the Internal Investigation Committee (IC). Appeals/ escalations on the decision of IC shall lie with Directors.

Amendments and updates

The Board of Directors can amend this Policy, as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

**Minor changes or update to the Code of Conduct Policy which do not materially alters its intent or scope may be reviewed and approved by the Management Committee*