

CODE OF CONDUCT

1. PREAMBLE

- This Code of Conduct is a statement of the IIFL's commitment to integrity and the highest standards of ethical practices.
- 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 various 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:
 - Underline the fundamental commitment to compliance with regulatory guidelines and laws of the land
 - Set forth basic parameters of ethical behaviour
 - Establish a system for detection and reporting of known or suspected ethical or violations of regulation
- Since we are committed to continuous reviewing and updating of policies and procedures, this Code is also subject to modifications
- The principles enshrined under the Code are inclusive in nature and the various circulars or directions issued by the management of IIF Group and must be read along with and constitute a part and parcel of this Code.

2. APPLICABILITY OF THE CODE

- This Code of Conduct is applicable to all the Employees and officers of IIFL Finance Limited and its Group Companies ["IIFL Group"].
- IIFL Group expects all its employees and officers to act in accordance with high professional and ethical standards. You must be, and be seen to be, committed to integrity in all aspects of your activities and comply with all applicable laws, regulations and internal policies.
- In accepting a position with IIFL Group or any of its subsidiaries, each of you become accountable for compliance with the law, with the IIFL Group Code of Conduct ('the Code'), and with policies of your respective businesses.
- The standards of the Code are not necessarily prescribed by the regulators - they are something which a well-respected institution must have in place and adhere to on an ongoing basis. We therefore expect a high level of ethical conduct.
- While covering a wide range of business practices and procedures, these standards cannot and do not cover every issue that may arise, or every situation where ethical decision must be made, but rather set forth key guiding principles that represent IIFL Group's policy.

3. VALUES *(above to be referred)*

4. PROTECTION OF PROPRIETARY INFORMATION

- Any information concerning the Company's business, its customers, suppliers, etc., which is not in the public domain and to which the employees or officers has access or possesses such information must be considered confidential and held in confidence unless specifically authorized to do so and when disclosure is required, as a matter of law and shall not be used by him or her for his or her personal gain or advantage.
- Unauthorized use or distribution of proprietary information violates the internal policies of IIFL Group and could be illegal. Such use or distribution could result in negative consequences for both IIFL Group and the individuals involved, including potential legal and disciplinary actions.
- Acts of ignorance that could lead to leakage of such proprietary information, especially through electronic means – like e-mails, web uploads, removable media (e.g. CD/DVD/pen drive) etc., may lead to investigation and probe against the employees.
- It is your responsibility to protect proprietary and confidential information (sensitive in nature) pertaining to the Company or its customers in a manner commensurate with its classification as per the principles enunciated in the Information Security Policy, Standards & Procedures of IIFL Group
- IIFL Group reserves the right to monitor its employees' activities on IIFL companies owned assets.
- We, at IIFL Group, respect the proprietary rights of other companies and their proprietary information and require you also to observe such rights.

5. MAINTAINING BUSINESS RELATIONSHIPS AND FAIR COMPETITION

- IIFL Group is committed in dealing with external stakeholders such as customers, competitors, suppliers, and any related agency that is based on the principles of fair competition, compliance with laws and regulations of the land, and in the spirit of honesty and integrity of our corporate values.
- While maintaining a competitive outlook in the market, we practice the following:
 - Following transparency in all of our business dealings
 - Conducting business in accordance with applicable laws and regulations
 - Respecting the confidentiality, privacy and intellectual property of external stakeholders.
 - Transfer of accurate and complete information from and to our customers while complying with internal proprietary policies, data protection laws and any contractual obligations
 - Transfer of accurate and complete information from and to our customers while complying with internal proprietary policies, data protection laws and any contractual obligations
 - Fair hearing to any concerns from our customers while acting promptly on the resolution. If the complaint involves data privacy or an accounting or auditing matter, special measures will be followed.
 - In terms of supplier relationship, the IIFL Group protocols on pricing quotation, SLAs, quality of services or goods or any other related matter will be followed in compliance with internal

and external rules or be subject to other internal restrictions or disclosure obligations under securities or other laws.

6. FAIR DEALING

- You must respect fair business practices in jurisdictions where you operate and endeavor to deal fairly with IIFL Group's customers, suppliers, competitors as well as internal customers. You should not take unfair advantage of anyone through manipulation, concealment, abuse of confidential information, misrepresentation of material facts, or any other unfair dealings.
- To maintain the spirit of fair dealings with any external body, you shall refrain from the following:
 - Engaging with any third party known to be involved in manipulative or concealing market practices (fixing prices, allocating sales markets, exclusive dealing with vendors) or with activities that threaten public order or safety.
 - Payment, acceptance, offer, or authorization of money, gifts, or any other forms of bribe and corruption with the customers.
 - Offering of anything of value to external stakeholders that could be construed as requiring or influencing any official decision and would give an impression of either obtaining or retaining business, suggesting that any business or service may be withdrawn or awarded in return for other business or securing an improper advantage vis-a-vis other organizations in the market.

7. MAINTAINING TRANSPARENCY AND CO-ORDINATION WITH GOVERNMENT REGULATORS

- All employees are expected to be responsive, fair and transparent with officers from regulatory, legislative or administrative bodies. The IIFL Group maintains a candid and proactive relationship with its regulators.
- Utmost co-operation with the regulators and thorough understanding of the regulators' mission, perspective and processes in alignment to IIFL Group internal policies and procedures is of key importance.
- IIFL Group is committed to following applicable laws, rules, and regulations of all localities, states, and countries where we do business, is not only the right thing to do, it helps maintain and protect our reputation.
- This includes appropriately communicating significant corporate developments and actions to relevant regulators.
- Responses to regulatory information requests should be completed accurately within the agreed time frame as per the internal policy guidelines and external regulations and must be safeguarded for delays, if any, by keeping the internal and external authorities in loop.
- All employees are also required to co-operate and report (and not withhold or misrepresent any information) for any violations of regulations, laws, internal processes, contract requirements, guidelines, etc., in any investigation as an involved party, witness or in terms of role responsibility.

- It is prohibited to disclose any aspect of investigation to any persons (either within our outside the organization) and maintain confidentiality of the situation.
- Making false statements, misleading internal or external auditors, investigators, legal counsel, other employees, regulators or other governmental entities can result in severe penalties.
- As an employee, you are expected to support this commitment and to serve IIFL Group best interest by:
 - Being responsible for ensuring that conduct in our activities are in accordance with the principles mentioned in the regulatory bulletins, circulars, advisories, manuals, checklists, and other guidance inclusive of statutory compliance and risk management guidelines
 - Discourage lobbying activities that attempts to influence or defeat the legislation on behalf of the IIFL Group
 - On suspicion of any untoward activities relating to conduct and relationship with regulators, promptly bringing to the notice of the compliance officials.

8. CHARITABLE CONTRIBUTIONS, CIVIC ACTIVITIES & SPONSORSHIPS

Any personal activities related to charitable and/or educational activities should not interfere or in any way conflict with your work or with the IIFL Group in any manner. When associated with a charity or civic activities in your personal capacity, it has to be ensured that there is no implied or presumed support of the IIFL Group.

9. PARTICIPATING IN TRADE ASSOCIATIONS, CONFERENCES AND SPEAKING ENGAGEMENTS

Meetings at professional gatherings, trade associations or conferences activities should not interfere or in any way conflict with your job duties or with the IIFL Group in any manner and may not be undertaken without the approval of the authorized personnel. There may be instances of contact with competitors for which you must follow the rules related to fair competition referenced in this Code and company policies.

10. POLITICAL ACTIVITIES & CONTRIBUTIONS

- No employee shall take an active part in politics, represent in a political party and contest for election anywhere outside the IIFL Group and shall not involve other employees, clients, suppliers, vendors or any other party with whom the company does business.
- Employees may not contribute or solicit political contributions, the IIFL Group Companies' funds or assets, resources to any political candidate, party, or similar organization; unless such contribution is expressly permitted by law/ regulation / directive and has been preapproved by the appropriate authorized representative of the IIFL Group. Under no circumstances will the IIFL Group directly or indirectly reimburse any employee for their individual contributions.
- Employees may not contribute or solicit political contributions, the IIFL Group Companies' funds or assets, resources to any political candidate, party, or similar organization; unless such contribution is expressly permitted by law/ regulation / directive and has been preapproved by the appropriate authorized representative of the IIFL Group. Under no circumstances will the IIFL Group directly or indirectly reimburse any employee for their individual contributions.

11. WORKPLACE CONDUCT

- Respect for Individuals and Fair behaviour and Employment Practices

- All employees are expected to practice our Code of Conduct and maintain professionalism, integrity, mutual respect and fairness in our daily course of business and relationship with colleagues or any other point of contact (internal or external).
- All Employees must treat their colleagues and business associates with dignity and respect, irrespective of caste, creed, gender, religion / region, nationality, appearance or any disability
- Employees must not use abusive and offensive language or any kind of gestures with their colleagues or business associates.
- Employees must not engage in any activity that is likely to result in disturbing the peace and harmony of the workplace.
- We aspire to be a meritocratic organization wherein employees continuously and consistently strive to demonstrate excellence and initiative.
- We, therefore, are committed to providing employees with the best opportunities to realize their potential and an environment where diversity is embraced.
- We, therefore, are committed to providing employees with the best opportunities to realize their potential and an environment where diversity is embraced.
- Employees are prohibited from creating situations which are threatening, intimidating, hostile, spreading false rumors or display abusive behaviour in the workplace. We should strive to maintain a disciplined, ethical, healthy and productive work environment and resolve any conflicts in an amicable manner.
- Respectful workplace concerns escalated by employees and/ or customers will be taken seriously and dealt with promptly.
- You should refrain from favoritism and making business decisions on emotions. All employees should also honestly disclose any information on family or relatives who work at the IIFL Group.
- No employee shall use his position or influence directly or indirectly, to secure employment for his son, daughter or any other member of his family in any private undertaking having official dealings with the company (this will include the IIFL Group borrowers, contractors, consultants and vendors).
- As an IIFL Group, we seek to maintain an inclusive diversity of our staff across branches and departments and recruit, develop and retain highly qualified, diverse and dedicated individuals for our workforce. The equal employment opportunity principles are based on fair employment regulations and nondiscriminatory practices at workplace.

➤ **Harassment and Discrimination**

Harassment is an undesirable verbal or physical behaviour that interferes with work or creates an intimidating, hostile or offensive work environment.

Examples include:

- Public or private tirades or bullying by a supervisor, subordinate, or peer
- Severe or repeated insults related to personal or professional competence
- Threatening or insulting oral or written comments
- Deliberate desecration of religious, racial, ethnic, or national symbols Malicious and knowingly false complaints against others.

We prohibit from any discrimination (race, gender, caste, religion, disability, marital status, pregnancy, culture, ancestry, socioeconomic status etc.) while in employment or advancement. The IIFL Group promotes a work environment where employees are valued and not discriminated

on the basis of any reason. We prohibit discrimination or harassment of any nature that violates our policies, whether committed by or against a manager, co-worker, client, supplier or visitor.

The IIFL Group prohibits uses of its communications, equipment, systems and services, including e-mail services and/or intranet/Internet services, to create a hostile, discriminatory, or offensive work environment. This includes downloading, transmitting, viewing or exchanging “jokes,” pictures, stories, videos or other communications or content which are threatening, harassing, demeaning or offensive to any individual.

➤ **Zero Tolerance Policy**

The IIFL Group has a “zero tolerance” policy for any violation of the Code of Conduct. This means that when an occurrence of a violation has been verified, appropriate action commensurate with the nature and pervasiveness of the violation will be taken. Employees who violate the Code may be subject to disciplinary actions, up to and including termination.

The following behaviors at work or activities while using IIFL Group systems are examples of actions that are prohibited and can result in disciplinary action:

- Sending or posting discriminatory, harassing, or threatening messages or images through the IIFL Group internal mails and/or through internet or any other mode of communication.
- Using the IIFL Group time and resources for personal gains.
- Unauthorized use of employee code including password of self or any other employees/staff. Sharing of user ID /password of each other. (Both the employees involved shall be held equally liable for any disciplinary actions) Copying, pirating, or downloading software and electronic files without permission.
- Engaging in unauthorized transactions that may or may not incur a cost to the organization.
- Participating or carrying out any activity that may damage the image or reputation of the IIFL Group.
- Participating in the viewing or exchange of pornography or obscene materials.
- Attempting to break /hack into the computer system of the IIFL Group and or any another organization or person.
- Suppressing or misrepresentation of facts.
- Refusing to cooperate with investigation.
- Sending or posting chain letters, solicitations, or advertisements not related to business purposes or activities.
- Using the IIFL Group internet/ intranet for promoting political causes or activities, religious activities, or any sort of gambling.
- Destroy records that are potentially relevant to a violation of law or any litigation or any pending, threatened or foreseeable government investigation or proceeding.
- Sending anonymous e-mail/SMS messages.
- Engaging in any other illegal activities.

- Working under the influence of alcohol or drugs.
- Fighting or threatening violence in the workplace.
- Spreading rumours and un-authenticated information
- Use of foul language in any written or verbal communications within the workplace.
- Negligence or improper conduct leading to damage of property or properties of the IIFL Group or customer.
- Insubordination or other disrespectful conduct with colleagues, customers etc. Smoking in the workplace at non-designated areas and Chewing of Pan Masala or any tobacco products.
- Possession of dangerous or unauthorized materials, such as explosives or firearms, etc., in the workplace.
- Absenteeism, overstaying leave or leaving workplace without permission or absence from work without notice/ approvals.
- Unsatisfactory performance at work or loss of confidence.
- Data theft or pilferage or any dishonest act.
- Refusing reasonable directions including moderate changes in responsibilities that may from time to time be given on account of business necessity and exigencies. Violation of any of the provisions of the security policy including IT security policy of the IIFL Group.
- Failure to perform duties with utmost integrity, honesty and diligence.
- Submitting and claiming false bills for reimbursement. Overstating expenditure vouchers.
- Violation of the IIFL Group Dress Code.
- Violation of the IIFL Group Mobile Phone Policy.
- Failure to carryout due diligence in any deal/transaction to avoid any possibilities of a fraud or money laundering.
- Refusing a reasonable request to moderate changes in responsibilities if such a change is a business necessity.
- Fudging or abetting fudging of attendance records.
- Poaching existing client and employees to our competitor.
- Engaging in any other trade/ business/ employment/associations/ engagement for commercial gains, while in the employment of the Company without the written approvals of the Management.
- Indulging in unauthorized/ unlawful / criminal acts, like forging of client documents (e.g. Customer's Insurance/ broking application form/ KYC-supporting documents such as identity/ birth proof).
- Trading in customer account without customer consent.
- Fraudulent and incorrect reporting of customer meetings or sales or business data.
- Multiple instances of being late for office/ customer meetings without reasons.

12. CODE OF CONDUCT FOR INSIDER TRADING

- While undertaking personal investments, it should be borne in mind that such investments should not:
 - Affect or appear to affect your ability to make unbiased business decisions for IIFL Group and its subsidiaries;

- Be contrary to IIFL Group's interests (e.g. using proprietary knowledge obtained through the course of employment to make investments that are not in the best interest of the IIFL Group);
- All employees should ensure strict compliance with the code.
- The code is applicable to all employees of IIFL Group and its subsidiaries and affiliates Companies.
- The code and trading restrictions are also applicable to all connected persons like immediate relatives, consultants for special assignments, auditors etc engaged by the company.
- All employees and connected persons should ensure confidentiality and be careful while handling Unpublished Price Sensitive Information (UPSI). All information should be disclosed only on 'Need to Know' basis.
- During the period when the employee is in possession of UPSI, no trading is permissible by the employees in that particular security;
- Employees shall not trade in securities when the trading window is closed, except for exercise of stock options;
- The minimum holding period of securities and contra trade restriction applicable as mentioned in the code available on IWIN.
- The disclosure requirement is required to be adhered by the designated persons in the prescribed format.
- The code is effective from May 15, 2015 and shall continue to be in force unless specifically amended. *(For more details refer to "Policy on Insider trading")*

REPORTING REQUIREMENTS FOR EMPLOYEES INCLUDING THE DESIGNATED PERSONS

The provisions of this section would apply to employees including the Designated Persons and their immediate relatives and to any other person for whom such person takes trading decisions:

- In order to ensure smooth administration and monitoring, trading and/or Demat accounts or PMS accounts (hereinafter referred to as 'Accounts') of the employees (including his/her spouse and dependents) shall be maintained under IIFL Group [IIFL Securities Limited, 5paisa Capital Limited, IIFL Wealth Management Limited or any other Broking/DP entity within the Group]. Outside Accounts, i.e. accounts with other brokers & DPs, if any, shall be closed within a period of one month of joining / employment in IIFL Group. Also, all existing F&O positions except index derivatives, currency derivatives and interest rate derivatives if any shall be closed immediately. If due to official/professional/compliance or any other reasons the outside accounts could not be closed or transferred or maintained with IIFL Group, the

information of holdings thereof held with outside DP / broker along with the reason for holding shall be disclosed to the Compliance Officer of the Company.

- If the employee wishes to make investments in securities or trade, he/she shall open trading and Demat account with IIFL Group.
- All the new joiners are required to give a declaration of their present holdings through the designated window for employee information. With reference to Clause (a) above, if any employee has DP ID/ Broking ID with an outside company such employees will have to give declaration of their holdings on an annual basis. However, such employee should ensure that all new transactions will have to be executed through IIFL account only.
- All new Designated Persons of the Company are required to submit details of their holdings of securities including the statement of immediate relatives to the Compliance Officer within 30 days of joining through IWIN.
- With a view to make the reporting process simple and keeping in view the size of operations and geographical spread of the Company all the employees shall have trading and Demat account only with IIFL Group. In case of employees keeping trading and Demat account only with IIFL Group a one-time declaration of Client ID and Demat ID of the respective employees and his/her relatives with IIFL Group under "Employee Code of Conduct" in IWIN or submissions in email / hardcopies shall be sufficient compliance of this requirement by the employees. If any addition/ deletion of IDs is done by the employee, declaration of the same shall also be made through IWIN. All trades shall be placed only through the dedicated employee dealing desk only in the format as prescribed in the Code. Employee using online trading shall comply with this code and obtain requisite approvals.
- In case of dealings in other than IIFL Group securities through IIFL Group dealing` desk the same would be considered as preclearance and monitoring through employees trading system is applicable.
- All the accounts of employees shall be regularly monitored by the Compliance Team under the supervision of the Compliance Officer for employee trading purpose. The Compliance Team shall keep a detailed record of all trades and holdings and perform verification of the same. This information shall be kept confidential by the Company. Except, the Compliance Officer and senior officials comprising the heads of respective departments and the directors of the Company no one else shall have access to this information. Internal Working Rules are as follows:
 - ✓ Access would be restricted for Websites offering emails or chatting services like Gmail, Yahoo etc. other than iifl.com or indiainfoline.com or internal e-mails except for identified employees who require or need to do business.
 - ✓ Mobile phones of dealers shall not be permitted inside the dealing room. The same shall be deposited in safe custody on a daily basis during the trading hours.

- ✓ The employees shall maintain confidentiality of all information. They shall not pass on such information directly or indirectly to any person other than the person officially intended to.

13. MANAGER AND LEADER RESPONSIBILITIES

- As a progressive organization, managers and leaders have a special responsibility to demonstrate our values through their actions. As Managers and leaders, you must foster an environment of integrity, honesty and respect. This includes creating a work environment that is free from discrimination, harassment, intimidation or bullying of any kind. You must also ensure that all aspects of the employment relationship are free from bias and that decisions are based upon individual performance and merit.
- As a Manager or senior leader, you are therefore additionally accountable for the following:
 - To be thoroughly familiar with the requirements of and the procedures established by the Code and to exemplify the highest standards of ethical behaviour.
 - To ensure that team members understand that business results are never more important than ethical conduct and compliance with applicable law and the IIFL Group policies.
 - To ingrain the principles of the Code and compliance with applicable laws, regulations, and policies into your business unit's practices. iv. To create a culture in which team members feel comfortable asking questions and raising ethical concerns without fear of retaliation.

14. SEXUAL HARASSMENT

- Sexual harassment is any unwelcome sexually determined behaviour, such as:
 - Physical contact and advances
 - A demand or request for sexual favours
 - Sexually coloured remarks
 - Showing pornography and
 - Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature
- The IIFL Group strictly prohibits any kind of sexual harassment and takes allegations of sexual harassment seriously. Employees will be subject to disciplinary measures for sexual harassment up to and including termination. Anyone experiencing and reporting such unwelcome behaviour should know that the matter will be handled with the utmost sensitivity.

(For more details, refer to "Policy on Sexual Harassment")

15. SAFE AND HEALTHY ENVIRONMENT

- The IIFL Finance considers safety of employees as a primary concern and strives to provide a safe and healthy work environment and comply with guidelines and applicable local / labor laws or regulations that govern workplace health and safety.
- To ensure healthy, safe and secure working environments, we must practice the following:
 - Strive to keep their own workplace and surroundings clean and hygienic.
 - Take all reasonable measures to avoid putting others' lives and health at risk by preventing workplace accidents and injuries
 - Give customers and colleagues adequate health and safety information.
 - You should be alert to individuals who are on premises of the IIFL Group without proper authorization and report any unusual activities being conducted within the workplace to the Unit Head or reporting authority
 - Ensure that visitors on company premises follow the appropriate procedures to prevent unauthorized access to materials, information or persons
 - Should not possess, distribute, sell, transfer or use alcohol, drugs, firearms or other items that could adversely affect health, safety and security in the workplace or in the working hours
 - Take adequate measures to protect the integrity of computer and information systems, including password protection.

16. COMMUNICATION WITH MEDIA

- Any official communication, verbal or electronic (which includes speeches, interviews etc.) with media and publishing houses, blog posts, websites, agencies, books, articles, podcasts, web casts, videos, can be undertaken only after specific authorization by the Corporate Communications department of the IIFL Group.
- Please be alert in situations where you may be perceived as representing the IIFL Group and do not make any statements on behalf of the organization unless you have been authorized to do so. You should also be diligent while using social media like X (formerly known as Twitter), WhatsApp, External Face book, YouTube, LinkedIn, etc.
- You should not post a comment, provide any recommendation, or endorse customers or vendors (either current or former) in the social media unless you are authorized to do so.

17. MANAGING PERSONAL FINANCES

- As a financial institution, the IIFL Group business depends on public confidence in our ability to help manage the financial affairs of others. In general, your personal finances are private
- However, because you represent the IIFL Group, it is important that you manage your personal finances in an appropriate and prudent manner, avoiding instances of excessive indebtedness or bankruptcy
- Any improper handling of your personal finances could undermine your credibility and the IIFL Group. It could also cause others to question your decision-making on the job
- You must refrain from any personal financial transaction with fellow employees, customers or suppliers, whether borrowing or lending. You must not lend personal funds to, co-sign, endorse, guarantee, or otherwise assume responsibility for the borrowings of any customer or vendor of the IIFL Group

18. PROTECTION OF IIFL COMPANIES ASSETS

Protecting IIFL Group Companies' assets against loss, theft or other misuse is the responsibility of every employee and officer. Loss, theft and misuse of IIFL Companies assets directly impact our profitability. Any suspected loss, misuse or theft should be reported to your supervisor.

19. BRIBERY AND CORRUPTION

- Bribery / Corruption are defined as receiving or offering of an undue reward from / to any third party. Employees must note that the IIFL group follows zero tolerance approach towards bribery and corruption.
- Employees must not make / receive any payment to / from anyone including any government / public servant for the purpose of obtaining or retaining business or for obtaining any favorable action. Bribing a public servant can attract severe criminal penal consequences both for IIFL as well as for its Employee(s) responsible for bribing under the Prevention of Corruption Act, 1988.

(For more details, refer to "Policy on Bribery and Anti-Corruption")

20. GIFTS AND ENTERTAINMENT

- Employees must not accept gifts or cash equivalent from vendors, suppliers, customers or any such third party, which will result in any violation of law or commitment to mutual respect.
- Acceptance of gifts that are in the nature of promotional items with the logo of the other party and / or of nominal value, occasional business meals, celebratory events and entertainment,

provided that they are not excessive nor create an appearance of impropriety, do not violate this Code.

(For more details, refer to “Policy on Gifts)

21. KNOW YOUR CUSTOMER / ANTI-MONEY LAUNDERING

- Employees must exercise requisite care in selecting those with whom they conduct business. While conducting business, Employees must adhere to processes which are in place for checking the credit and character of customers and counter parties.
- These processes ensure adequate customer due diligence and ongoing monitoring of their transactions. This is also done to detect suspicious transactions during the entire period of relationship.
- Money Laundering legislations criminalize money laundering in respect of all crimes including drug trafficking, terrorism, theft, tax evasion, fraud, handling of stolen goods, counterfeiting and blackmail. It is also an offence to undertake and / or facilitate transactions with individuals and entities involved in criminal activities.

(For more details, refer to “Policy on ANTI- MONEY LAUNDERING”)

22. MAINTAINING THE ACCURACY OF COMPANY RECORDS AND REPORTING REQUIREMENTS

- Data and information relating to the IIFL Group that is publicly disclosed or is provided to regulators should be complete and accurate.
- IIFL Group is committed to integrity of financial reporting and complete disclosures as mandated under applicable law and regulation. Falsification of any information or data (i.e. mis-statement, alteration, modification, omission or deleting of information) related to the IIFL Group is a serious misdemeanor and is prohibited.
- You must ensure that records, data and information owned, collected, used and managed by you for IIFL Group are accurate and complete.
- Records must be maintained as per the applicable record retention policy of your Company in sufficient detail so as to reflect accurately the company's transactions.