



## **ETHICS AND CODE OF CONDUCT POLICY**

Author of the Policy	Human Resources Department
Vetted by	Chief Compliance Officer
Approver of the Policy	Board
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Date of Policy	August 13, 2024

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**Introduction**

Veritas Finance Private Limited (hereinafter referred to as “Veritas” or “the Company”) is a private limited company incorporated under the provisions of the Companies Act, 2013, registered with the Reserve Bank of India.

Veritas is engaged in the business of extending loans to entrepreneurs engaged in micro, small and medium enterprises with limited access to formal financial services.

Veritas is committed to conduct its business in accordance with the highest ethical standards, in order to merit and maintain the complete confidence and trust of all our stakeholders - customers, investors, staff members, customers and vendors and others we deal with.

This policy addresses both business and social relationships, which may present legal and ethical concerns, and also sets forth a Code of Conduct to guide all the staff members. It articulates the boundaries of behavior as well as expectations for behaviour. When each employee clearly knows the ethical standards of Veritas , they are more likely to recognize wrongdoing.

This policy is intended to serve as the charter for day -to-day work to enable employees to make the right decisions while performing their roles and responsibilities across various functions in Veritas and, therefore, serve to underline the fundamental commitment to compliance with regulatory guidelines and laws of the land and the basic parameters of ethical behaviour.

**Applicability**

The policy is applicable to all the Veritas employees, Directors, consultants, agents, third party whose services Veritas has solicited, will also undertake to comply with the Policy as part of their business relationship with Veritas. Veritas reserves the right to interpret the policy at its sole discretion.

**Administration of the Policy**

It is the responsibility of each Director and Staff Member to be familiar with the Policy. The supervising staff are expected to make every reasonable effort to ensure that their subordinate staffs continue to comply with the provisions of the policy. Staff members are encouraged to seek the advice of the appropriate supervisor regarding questions of interpretation, and of the applicability of the provisions of the policy to a particular situation.

**Observance of the Policy**

All Employees are required to affirm their having read and understood the Code and confirm to abide by it by signing a Declaration (Annexure I), to be submitted through HRMS, which shall be deemed to be binding on the signee.

**Interpretation of the Policy**

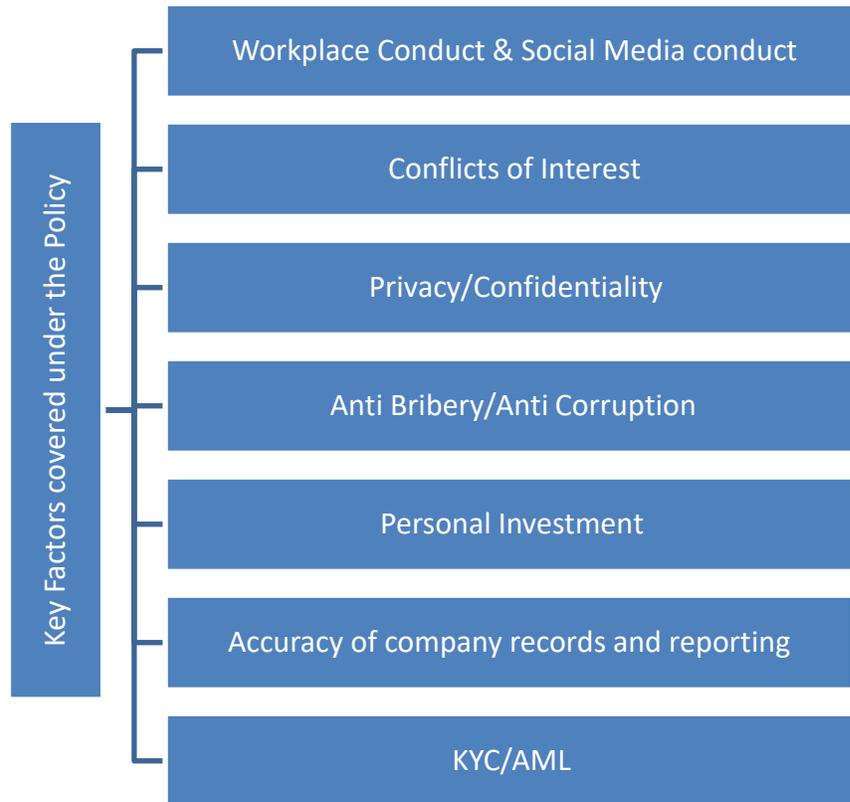
In case of any questions or clarifications, the Chief People Officer will be the competent authority to clarify / interpret the same.

Veritas's reputation of honesty, integrity and security reflects the personal reputation of Veritas's directors, officers and staff members. This reputation is protected by Veritas's established Ethics and Code of conduct policy.

**Ethical Principles**

- 1) Integrity & Honesty: Acting with integrity and honesty means that one should be ethical, sincere and transparent in all our transactions. As employees of Veritas , we should keep our commitments. We should speak up when uncomfortable or uncertain, especially if it comes to actions and behaviors that contradict our organization's core values and culture.
- 2) Compliance with laws and regulation: It is our fundamental duty to comply with regulatory guidelines and laws of the land.
- 3) Confidentiality: Veritas's confidential information is a valuable asset and every employee, vendor and stakeholder of Veritas must protect it. We must comply with all policies and guidelines relating to security and privacy of confidential information.
- 4) Conflict of Interest: All employees are required to maintain the highest levels of professional and personal integrity to avoid situations of conflict, in the interest of Veritas.
- 5) Anti-bribery & Anti-corruption: We have zero tolerance towards anything of value that may be seen as an attempt to influence an action or a decision in our dealings with the various entities. This could include money, gifts, favors, entertainment etc. Any actions relating to bribery, kickbacks, improper payments should not be entertained.
- 6) Gifts & Entertainment: Gifts and entertainment offer given or received should be appropriate, modest in value i.e., not exceeding Rs. 5000/- in value, and in compliance with our Company's guidelines.
- 7) Fair Dealing and Responsibilities to Customers: We must deal fairly with the customers, vendors, service providers, stakeholders and others with whom we interact while at work. We should refrain from taking undue advantage by manipulating/ concealing/ misrepresenting facts, misusing confidential information or any other unfair practices.
- 8) Accountability: Ethics and values must not get side-tracked in pursuit of any goal. There should not be any compromise on due diligence and complying with KYC norms.
- 9) Trust & Reputation: Trust is our foundation, through trust we add value to our customers. Any unethical act compromises this trust and brings down the reputation. Each individual unethical act is against the organization and is against all of us. As an employee, guarding the reputation of the Company should be our prime focus.

- 10) Doing Right at All Times: Finally, one must understand that no business or customer is more important than our responsibility to do right at all times.
- 11) Ethical Dilemma When faced with a situation where proper conduct is not self-evident, the Code of Conduct and Ethics may help you decide what to do.

**Purpose of the Policy:**

- 1) To promote a consistent understanding of, and approach to, the standards of ethical behaviour, including the ethical approach to actual or apparent conflicts of interests between personal and professional relationships;
- 2) To raise awareness of acceptable and unacceptable behaviour, and through this endeavour to avoid any real or perceived misconduct;
- 3) To promote prompt internal reporting of violations and suspected violations;
- 4) To build a strong and adequate internal process and governance and reinforce the right conduct and behaviour amongst the employees to avert a culture of misconduct which is normally associated with wilful disregard of laws, regulations and governance policies/processes/procedures.
- 5) To reinforce an independent internal ombudsman mechanism with Veritas to resolve customer complaints.

- 6) To clearly define acceptable and unacceptable behaviours linked in particular to financial misreporting and misconduct, economic/financial crime, including fraud, money laundering and anti-trust practices, bribery, corruption, market manipulation, mis-selling and other violations of consumer protection laws;
- 7) To clarify that in addition to compliance with legal, regulatory requirements and internal policies, everyone in the organisation is expected to conduct themselves with honesty and integrity and perform their duties with due skill, care and diligence
- 8) To ensure that all are aware of the potential internal and external disciplinary actions, legal actions and sanctions that may follow unacceptable behaviours.

**Conflicts of Interest**

Conflict of interest implies a situation of conflict between the duty of a person and private interests of an individual, which could improperly influence the performance of his/ her duties and responsibilities. Conduct & ethics are liable to get challenged when there are instances of conflicts of interests.

Examples of situations which may arise due to conflicts of interest (which is not a exhaustive list)

- 1) Accepting engagement outside Veritas may benefit you in any manner.
- 2) Engaging in personal investment decisions by conducting trading in personal accounts based on information learned as a result of employment with Veritas (also refer to the Insider Trading Guidelines)
- 3) Taking a business decision (including lending decisions, guarantees) that may result in personal gain, or benefit to a relative or acquaintance.
- 4) Using your authority or knowledge of confidential information for personal benefit.
- 5) Serving in a fiduciary capacity or as a director, official, any elected post of a company or political party outside of Veritas for non-profit, trade/industry, government agency without approval by Veritas
- 6) Competing with Veritas for a business opportunity or diverting opportunities.
- 7) Accepting money, favors, gifts, meals, entertainment or other benefits (seen to be beyond normal business courtesies) that may influence business or commercial decisions of Veritas.
- 8) Promoting a particular vendor or entity for personal gain.
- 9) Using Veritas's facilities, employees, funds, property or resources towards personal activities.
- 10) Contributing to a charitable cause/fund at the behest of a customer in order to maintain

a business relationship.

- 11) Sourcing candidates you have worked with in earlier organizations and also being part of their decision/selection process.
- 12) Employing relatives or undertaking business with a relative or any entity where your relative has a financial interest.
- 13) Employees /Directors should not purchase the property 'repossessed' by Veritas

### **Gifts and Entertainment**

On certain occasions, it is customary to give promotional items of nominal value to customers, colleagues, and other parties who have a business relationship with us. However, a conflict of interest may arise if one offers or receives gifts or entertainment offered of substantial value from customers/ persons/ institutions having official dealings with our Company. The gifts and entertainment offer given or received should be appropriate, modest in value i.e., not exceeding Rs. 5000/- in value and in compliance with our Company's guidelines.

### **Privacy & Confidentiality Obligations**

- 1) Privacy of Employee Information Safeguarding of personal and confidential information relating to an employee should be strictly exercised. Veritas maintains appropriate safeguards to respect the personal privacy of staff members and protect the confidentiality of personal information about them. Employee-related information should not be shared or discussed with any external agencies or employees, except where internally authorized or required by applicable law, regulation, jurisdiction, administrative or legislative body. You must comply with all policies and guidelines relating to security and privacy of personal and confidential information, ignorance of which can lead to disciplinary measures. Responses to requests for such information may be provided only as permitted by applicable internal policies and authorization, law or regulations. Workforce guidelines for privacy and security cover our employees as well as other individuals whose information is provided to Veritas within the context of the working relationship.
- 2) Protecting Proprietary and Confidential Information: Proprietary and confidential information relating to Veritas's business and operations (listed illustratively below) is the property of Veritas. It may include sensitive information and data that is not in the public domain and should not be shared.
  - Business plans
  - Company' financial performance, if it has not been disclosed
  - Company's trading activities, holdings of investments
  - Customer data and transaction data

- Employee data
- Information relating to technology, systems and processes
- Information related to Data Centre's
- Passwords, computer programs and soft wares being used by Veritas
- Marketing plans, strategies and costs

### **Workplace Conduct, Acceptable Social Behaviour Social Media Conduct**

All employees are expected to adhere to all applicable Laws, rules, principles and norms of society.

#### a) Fair Behavior and Employment Practices

All employees are expected to practice our Code of Conduct and Ethics guidelines 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). At all times, we must treat our teammates with respect, share the responsibility for our successes and accept accountability for our failures. Employees are prohibited from creating situations which are threatening, intimidating, hostile, spreading false rumors or display abusive behavior 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 with Veritas.

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 the workplace.

#### b) Harassment and Discrimination

Harassment is an undesirable verbal or physical behavior 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 makes false complaints against others

Veritas prohibits any discrimination (race, gender, caste, religion, disability, marital status,

pregnancy, culture, ancestry, socioeconomic status etc.) while in employment or advancement. Veritas promotes a work environment where employees are valued and not discriminated against 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. Veritas 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.

c) Sexual Harassment (POSH)

Veritas’s POSH policy, as applicable to all employees and is in consonance with the provisions contained under “The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013”.

According to The Supreme Court of India, the definition of sexual harassment is any unwelcome sexually determined behavior, such as:

- Physical contact and advances
- A demand or request for sexual favors
- Sexually colored remarks
- Showing pornography
- Any other unwelcome physical, verbal or non-verbal conduct of a sexual nature

Veritas 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 behavior should know that the matter will be handled with the utmost sensitivity. (Refer latest “Prevention of Sexual Harassment at the Workplace” policy)

d) Social Media

Social media like blogs, wikis, social networks, team spaces are changing the way we communicate and engaging with customers, colleagues and the world at large. In view of the growing prominence of social media and increased use of these technology platforms by customers, Veritas uses Social Media platforms to engage with customers, exemplify company / brand values, draw awareness to its products and services, gain feedback and position itself as a technologically savvy and innovative financial services provider. Veritas currently has its social properties across 4 mainstream social channels – Facebook, YouTube, LinkedIn & Instagram. While Veritas recognizes the ubiquity and benefits of social

media in building stronger and successful business relationships, it is desirable to provide guidance to employees on what is appropriate and acceptable to post about the Veritas or its products, services, employees and other stakeholders in social networking sites and media. Veritas's core values together with the Code of Conduct and Ethics provide the foundation for the guidelines for the use of social media by employees. The principles and guidelines enunciated in the Code of Conduct and Ethics, apply to the employees of Veritas and their activities, be it traditional media or online. The following disclaimer should be pasted on the employee's personal social media profile(s), where matters related to Veritas are discussed/likely to be discussed – "Views expressed are the personal views of the user and do not necessarily represent the opinions of Veritas Finance. Veritas Finance takes no responsibility whatsoever if anyone acts on the basis of the views expressed."

Employees must only use their personal email ID to create a personal website or post content on Social Media. Employees are advised to refrain from engaging in discussions which may hurt people's religious, racial and political sentiments or posting comment, content or images which are libelous, offensive, harassing, threatening, hateful, intruding privacy, inappropriate and obscene or in violation of Company's internal guidelines, including POSH guidelines or any applicable law. Employees should not publish, post or engage in discussions on social media that are considered confidential and not made available in the public domain by Veritas. It is imperative that employees use good judgment and common sense to ensure that their actions reflect the values of the Company. Should there arise an occasion where an employee receives a query from online media (bloggers, news agencies, online media through their social media channels) or mainstream media (print, TV, etc.) it should be referred to the Corporate Communications or mailed to [corpcomm@veritasfin.in](mailto:corpcomm@veritasfin.in). Further, if any employee spots any potential feedback/query/customer issue that may warrant an official response or come across any negative remarks related to the Company on the social media landscape, the same should be brought to the immediate notice of the Corporate Communications Department.

### **Work Place Health And Safety**

Veritas strives to provide a safe work environment and comply with guidelines and applicable local laws or regulations that govern workplace health and safety.

To ensure healthy, safe and secure working environments, we must practice the following:

- 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 Veritas without proper authorization and report any unusual activities being conducted within the workplace to the 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
- Take adequate measures to protect the integrity of computer and information systems, including password protection

**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 authorization by the Corporate Communications. Please be alert in situations where you may be perceived as representing Veritas 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 Twitter, Facebook, YouTube, LinkedIn, etc. You should not post a comment, provide any recommendation or endorse customers or vendors (either current or former) on social media unless you are authorized to do so.

**Maintaining Accurate Company Records and Reporting Requirements**

Data and information relating to Veritas that is publicly disclosed or is provided to regulators should be complete and accurate. Veritas is committed to the 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 Company is a serious misdemeanor and is prohibited.

**Information Security**

Information Security is the practice of protecting information and systems from unauthorized access, use, disclosure or modification. Veritas has developed procedures covering physical access control to ensure privacy of communications, maintenance of the security and safeguard Company's assets from theft, misuse and destruction. Employees are responsible for complying with the security policies of Veritas . Employees must be aware of our policies and procedures relating to information management. All information must be treated in accordance with our Information Security and Privacy Policy. By practicing small and simple steps we can make a big difference in protecting our information assets like: -

- Always wear your ID card in person.
- Always use strong passwords for all your accounts.
- Lock your computer screen whenever you leave the work desk.
- Lock away all documents and files before leaving the office.
- Pick printouts immediately after printing. Do not leave them unattended.
- Shred hard copies with sensitive information before disposal.
- Always ensure that nobody is behind you while logging into an official account to avoid shoulder surfing.

If you suspect any security vulnerabilities or incidents with Company's system report it to [isg@veritasfin.in](mailto:isg@veritasfin.in)

**Assets of the Company:**

Assets of the company , whether tangible or intangible in nature, may be used only for approved purposes. Assets are inclusive (but not limited to) of cash, funds, securities, physical property, professional services, internal plans or business strategies, client and employee information, supplier details, distributor information, equipment like computers, telephones, fax machines, intellectual property (software, office mails, shared disk drives, computer programs, models, copyrights and other items), company logo & brand, office supplies and all other personal, proprietary and confidential information. Veritas reserves the right to intercept, monitor and record your communication on Veritas's systems including mail, computers etc., in accordance with the law of the land. Report any suspected fraud or theft of Company's assets.

**Managing Personal Finances**

In general, your personal finances are private. However, because you represent Veritas, 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 including return of cheques/ NACH/ ECS, etc. and overdue loan accounts could undermine your credibility and that of the Company. It could also cause others to question your decision-making on the job. You must refrain from any personal financial transaction with fellow employees. Any kind of transactions with customers, channel partners, outsourced employees, vendors or suppliers, including borrowing or lending is strictly prohibited. You must not lend personal funds to cosign, endorse, guarantee, or otherwise assume responsibility for the borrowings of any customer or vendor of the Company unless the customer or vendor is a family member, other relative, or close personal friend and the personal or family relations, and not the company's

business, is the basis for the transaction.

Veritas reserves the right to check/ access the details of the employee during the onboarding process or as required by Company from various bureaus/ Central Fraud Registry/ CIBIL etc. Any deficiency / negative records in the above checks may attract suitable action.

### **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 behavior.
- To ensure that team members understand that business results are never more important than ethical conduct and compliance with applicable law and Veritas's policies.
- To ingrain the principles of the Code and compliance with applicable laws, regulations, and policies into your business unit's practices.
- To create a culture in which team members feel comfortable asking questions and raising ethical concerns without fear of retaliation.

### **Disciplinary Procedures and Penalties**

(a) For violation of the Code or any orders/rules issued by Veritas, an employee shall be liable for any of the following penalties:

- Counselling
- Caution
- Warning or Censure
- Withholding of Increments/Withholding of Variable pay/ Revision of Pay/Withholding of Incentives/Reduction in PLI
- Withholding of promotion
- Reduction to lower grade or salary
- Suspension
- Discharge from service
- Dismissal from service

- Recovery from salary or Veritas balances, or full and final settlements amounts as may be due to him of the whole or part of any pecuniary loss caused to the Company by negligence or breach of orders

- Withholding processing of resignation

In the event the employee does not submit a reply to the show cause notice or fails to attend the personal hearing within the stipulated period, the Disciplinary Committee will proceed to pass an appropriate order ex- parte, and the same shall be binding on the employee.

- (b) For major misconduct cases, a Show Cause Notice will be issued to the concerned employee, a personal hearing will be conducted if required by such employee. In the event the employee does not submit a reply to the show cause notice or fails to attend the personal hearing within the stipulated period, the Disciplinary Committee will proceed to pass an appropriate order ex- parte, and the same shall be binding on the employee.
- (c) For minor misconduct cases, an enquiry need not be held, and a disciplinary order may be issued against the concerned employee basis of the findings in the investigation report.
- (d) For all cases, where an employee has made a voluntary admission of his misconduct at any time prior to or during investigation of the misconduct, an enquiry need not be held, and a disciplinary order may be issued against the concerned employee basis the findings in the investigation report.
- (e) Notwithstanding anything stated herein, if the investigation report concludes that the employee was involved / indulged in misconduct which is in the nature of:
- i) omission/ commission with a mala-fide intent;
  - ii) serious/major offence including but not limited to misappropriation of funds, physical violence, forgery, bribery, gratification etc.; and /or
  - iii) causing grave reputational risk/ loss to the Company , and the employee has accepted the same / there is conclusive evidence for the same as stated in the investigation report, a disciplinary order may be issued against the concerned employee basis the findings in the investigation report.
- (f) An appeal may be filed to the Appellate Authority as per Disciplinary Committee's standard operating procedure An employee may be suspended at any time after detection of a transgression and/or receipt of a complaint with approval from an Ethics and Conduct Committee if the investigation department or the said authority is prima-facie of the opinion that the employee has committed a major offence and/or the

employee's continued presence in the Company may hamper the investigation or be prejudicial to the interest of Veritas and/or other employees/officers of Veritas.

- (g) An employee may also be suspended by the Disciplinary Committee if the employee is arrested or detained in judicial/police custody for any reason whatsoever (even if such reasons are not in relation to his employment with Veritas).

### **The Whistle Blower Policy- Reporting violations**

It is intended to offer protection for the employees of Veritas and its directors, if they raise concerns in respect of the following:

- Corruption: accepting consideration in cash or kind from customers/middlemen for favourably considering credit proposals or any other pecuniary benefits/facilities from Veritas, for which they are otherwise ineligible as per extant rules or undeserving or there are cogent grounds or reasons for them to not get the said benefits/facilities from Veritas.
- Misuse of office: misuse of discretionary lending/administrative powers.
- Unauthorized debits to General Ledger/Profit and Loss accounts like Intermediary accounts, Sundry Deposits, Sundry Creditors, Proxy Accounts, Sundry Charges, Stationery etc. and also other Sensitive Accounts.
- Obtaining personal gains for settling genuine claims of customers.
- Misuse of premises for unauthorized/illegal activities.
- Misuse of cash of by Employees/custodians for personal gains.
- Criminal offenses or unlawful activities and activities which otherwise amount to serious improper conduct.
- Fraud.
- Failure to comply with existing rules and regulations resulting in financial loss or operational risk, loss of reputation and activities that are not in line with our Veritas's policies.
- Incorrect financial reporting
- Any matter which falls within the realm of 'Moral Turpitude' and is being undertaken by an individual or committed by him/her and being hidden/concealed from Company/appropriate authorities, whether inside or outside Company.
- Any other such matters raising doubt on the individual's integrity or honesty leading to corruption, misuse of office, or gross violation of systems and procedures leading to reputational/financial loss to the institution.

Government Relations

- Dealing with government entities exposes Veritas and its employees to a myriad of public policy, legal or compliance concerns.
- We do not attempt to influence government employees in any manner.

**Political non-alignment**

We do not offer, give or promise money or anything of value to any political party or candidate for political office if it could be seen as being intended to influence Veritas business relationship.

We ensure that our conduct precludes any activity that could be interpreted as mutual dependence/favour with any political body or person, and we do not offer or give any funds or property or other resources as donations to any political party, candidate or campaign.

**Insider Trading**

Insider Trading involves the improper use of non - public price sensitive information when dealing in securities. Specified employees are prohibited from engaging in insider trading as detailed in the Code of Conduct for Prevention of Insider Trading. This may be read in conjunction with the Board approved policy “Code of Fair Disclosure” and “Conduct for Prevention of Insider Trading” hosted on the Website.

**Audit & Investigation**

Employees must cooperate with any internal or external investigation or audit, or any regulatory examination. If at any time, the employee is involved in any legal/administrative/quasi-judicial proceeding(s), they should immediately inform the competent authority, with relevant supporting documents and a brief summary of the proceedings

**Violation of the Policy**

Any violation of this policy is liable to attract disciplinary action depending on the nature, severity, and frequency of the violation.

**Ethics and Code of Conduct Committee:**

The committee under this policy will ensure observance of this policy and also any violation of the policy would be reported to Committee. The committee will resolve the issues and any gross misconduct would be forwarded to Disciplinary Committee for its deliberations.



**Review of the Policy:**

The Policy will be reviewed as and when required in the light of any statutory requirement. Notwithstanding, Veritas reserves the right to review, modify and amend the policy whenever deemed necessary.

**Annexure 1****DECLARATION**

I, hereby, declare that I have read & understood the Ethics and Code of Conduct Policy and understand my obligations as an employee to, hereby, comply with the said Policy , as applicable at all times. I confirm and undertake to abide by the same in letter and spirit. I am also aware that failure to abide by the above Policy may lead to disciplinary action as per Veritas’s Regulations/Rules

Employee Name

Employee ID

Designation

Branch/Office

Signature