

# Code of Conduct

At MFLC we promote ethical conduct and employees carry out their responsibilities honestly, in good faith and with integrity, based on the principle of prudential standards of a financial services entity, and for the benefit of the company and concerned stakeholders rather than their own benefit and, at the same time, respect the policies and employee codes of conduct adopted by MFLC

All executives and employees Comply with policies, procedures internal to the company and applicable government laws, rules, and regulations are bound by:

- **Declaration of Secrecy:** Prior to the assumption of duties employees shall be required to sign a Declaration of Secrecy thereby pledging strict secrecy in respect of all data, information and other matters
- **Non-disclosure of material confidential information:** Material Confidential Information which is not publicly available should not be disclosed to another employee/Director nor any other person, even if there is reason to believe that such person will keep the information confidential, except when required by Law.
- **Prudent use of Material Confidential Information:** Employees shall be prudent in the use of Material Confidential Information acquired during the course of their duties. They shall not use Material Confidential Information for any personal gain or in any manner which would be contrary to law or detrimental to the business/ reputation of MFLC, during their term of employment or thereafter.
- **Disclosure of Conflict:** Employees shall disclose any possible conflict of interest situation, which could reasonably be expected to impair his ability either directly or indirectly to render unbiased and objective advice when making recommendations or taking action on behalf of MFLC and/or its Clients.
- **Avoid any activity that may be categorized as abuse of position:** Employees shall not misuse or abuse their positions to obtain favoured treatment by way of financial benefits when conducting business with MFLC either on their own account or on account of their family Members and similarly shall not misuse or abuse their position MFLC to obtain the same from a client either for themselves or for family members.
- **Anti Bribery and comply with procedures on acceptance of gifts:** The acceptance of overly generous gifts or inducements could create a conflict of interest and damage the reputation of MFLC. Subject to the provisions herein contained in respective policies, employees shall not themselves accept or allow a family member to accept gifts, services, loans, or favoured preferential treatment from anyone- customers, suppliers or others.

- **Responsible use of MFLC's facilities, equipment, personnel and information technology:** Copying, selling or distributing software, software manuals, procedure manuals and training manuals relevant to MFLC's systems and procedures, computer network/environment directly/indirectly in violation of licensee agreements of copyright law and the use of pirate software in MFLC's computer network/environment is strictly prohibited. Similarly bringing in or installing any form of Software into MFLC's computer network/environment by employees is strictly prohibited
- **Practice non Discrimination and anti-bullying and Harassment:** MFLC respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age, political loyalty or engage in any kind of verbal or physical harassment.
- **Avoid Political Activities:** No employee of MFLC shall contribute or lend money or items of any value to any of the political candidates or parties. This also includes using MFLC's facilities, equipment, personnel. In case of an employee considering assuming any public office, specific information with all related reasons must be provided to MFLC for approval.
- **Anti-Smoking Policy:** To protect and enhance our indoor air quality and to contribute to the health and well-being of all employees, MFLC shall be entirely smoke free. Additionally, the use of all tobacco products, including chewing tobacco, is banned from MFLC workplace. Smoking is prohibited in all of the enclosed areas within the MFLC worksites, without exception. This includes common work areas, conference and meeting rooms, private offices, hallways, the lunchrooms, stairs, restrooms, employer owned or leased vehicles, and all other enclosed facilities. And within the close vicinity of MFLC premises.

MFLC enforces robust measures where required to establish with defined responsibilities to address all necessary actions to enforce the policies and procedures in place. Any employee who violates the applicable policies, will be subject to review, which may include disciplinary action, up to and including dismissal. Violations of this company policies may also constitute violations of law and lead to criminal or civil penalties being pursued upon those found to compromise the integrity and values of MFLC.