



## **InGovern Code of Conduct**

### **Purpose**

The purpose of this document is to ensure that the employees and or a person representing InGovern act lawfully, honestly, ethically, and their act is in the best interests of the company while they perform duties on behalf of the company. This will help provide a guide to business conduct thereby fostering a conducive, disciplined and organized work culture.

### **The inspiration behind the code**

InGovern's code of Conduct is guided by the symbolism of our logo. This logo of InGovern is based on InGovern's belief that companies need to guard their reputation zealously and that long-term value can only be created by good governance and sustainable growth. The InGovern logo comprises of 3 pillars of 'Gold' colour. The 3 pillars symbolize:

- Reputation
- Value
- Wisdom

### **Applicability**

InGovern expects all its employees, directors, advisors, consultants and analysts to abide by the code.

### **Compliance**

All those who are covered under this code have to abide with all local environmental, safety and fair dealing laws.

Employees are to be guided by the principals of ethics while dealing with anyone on behalf of the company.

### **The code of conduct shall encompass:**

1. Honesty and Good Faith: We shall act honestly and in good faith.
2. Diligence: We shall act with due skill, care and diligence and shall ensure that the research report is prepared after thorough analysis. Our clients deserve the best and value our services only if we deliver value.



3. Conflict of Interest: We shall effectively address conflict of interest which may affect the impartiality of its research analysis and research report and shall make appropriate disclosures to address the same.
4. Insider Trading or front running: We shall not engage in insider trading or front running or front running of its own research report or our advisory services.
5. Anti-Corruption: We shall not engage in any act which equate to commercial bribery or corruption.
6. Confidentiality: We shall maintain confidentiality of the report till the report is made public.
7. Data Privacy: We shall use office resources with prudence and judgement and ensure utmost data privacy and all data shall be accessed, preserved, and reviewed in strict confidence and in accordance with applicable data privacy laws.
8. Professional Standard: We shall observe high professional standard while preparing research reports or advising our clients.
9. Compliance: We shall comply with all regulatory requirements applicable to the conduct of its business activities.
10. Responsibility: The senior management, in particular the Managing Director, shall bear primary responsibility for ensuring the maintenance of appropriate standards of conduct and adherence to proper procedures.

### **Contact for Reporting of Concerns**

Incase of any employee facing any concerns at workplace or while dealing with clients, is expected to communicate the same at the earliest to their manager / immediate reporting head.

InGovern as a policy will not retaliate, and will not tolerate retaliation, against any individual for reporting a good-faith concern or complaint to a manager, HR, Legal, Audit, Finance, or the Disciplinary Committee, or for participating in the investigation of a concern or complaint.

### **Breach**

A breach of this Code will be regarded seriously and may lead to disciplinary action being taken against the employees, including termination in serious cases. Not reporting a breach of code knowingly will also be treated as a violation of our code of conduct.

Last updated on 27th November 2023