PAHARIMATA COMMODITIES PRIVATE LIMITED
CIN: U51109WB1995PTC073699 · RBI CoR: B-05.05756 dated 14 November 2003 · Non-deposit taking NBFC-ICC (Base Layer)
Registered Office: Office No. 214, 2nd Floor, Siddha Weston, 9 Weston Street, Kolkata – 700013

Document No.	Version	Adopted by the Board on	Last reviewed	Next review due	Policy owner
PCPL/POL/010	1.0	1 April 2026	1 April 2026	12 months from adoption	Amol Kothadiya, Director

CODE OF CONDUCT

(Adopted voluntarily as a measure of good governance for directors, senior management and employees.)

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1. Preamble

As an RBI-registered lender, Paharimata Commodities Private Limited ("the Company") depends on the trust of its borrowers, lenders and regulators. This Code of Conduct records

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the standards of integrity and professional behavior expected of everyone who acts for the Company.

2. Applicability

This Code applies to all directors, senior management, employees, and through their engagement terms - consultants, agents and authorized representatives of the Company ("Covered Persons").

3. Core Standards

Every Covered Person shall: act with honesty, integrity and diligence; place the Company's legitimate interests ahead of personal interest in all Company matters; exercise independent professional judgment; and conduct themselves in a manner that upholds the Company's reputation.

4. Compliance with Laws and Regulations

Covered Persons shall comply with all applicable laws, RBI directions and internal policies including the Fair Practices Code, the KYC/AML Policy, the Interest Rate Policy and the Grievance Redressal Policy - in both letter and spirit, and shall cooperate fully with auditors, inspectors and regulators. No Covered Person shall falsify, misstate or suppress any record or information.

5. Conflicts of Interest

5.1 Covered Persons shall avoid situations where personal, financial or family interest conflicts, or appears to conflict, with the interests of the Company, and shall disclose any actual or potential conflict to the Board as soon as it arises.
5.2 Directors shall additionally comply with the disclosure and abstention requirements of the Companies Act, 2013 and the Related Party Transactions Policy.
5.3 No Covered Person shall use their position, or information obtained through it, to derive personal benefit, or divert to themselves or any associate a business opportunity belonging to the Company.

6. Confidentiality and Data Protection

Information concerning borrowers, counterparties, group entities and the Company's own business shall be kept confidential, used only for legitimate Company purposes, and handled in accordance with the Privacy Policy and applicable data protection law, during and after association with the Company.

7. Fair Dealing with Borrowers and Counterparties

Covered Persons shall deal with borrowers and counterparties fairly and courteously, shall not misrepresent products, pricing or terms, shall not take advantage of any person through manipulation, concealment or abuse of privileged information, and shall observe the recovery-conduct standards in the Fair Practices Code without exception.

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8. Protection of Company Assets and Financial Integrity

Company assets, funds and systems shall be used only for legitimate business purposes. All transactions shall be recorded accurately and completely in the Company's books, and all reporting to lenders, auditors and regulators shall be true, fair and timely.

9. Gifts, Entertainment and Improper Payments

No Covered Person shall offer, give, solicit or accept any bribe, kickback, facilitation payment, or any gift or entertainment intended to improperly influence a decision. Customary business courtesies of modest value may be accepted if they create no obligation; anything beyond shall be declined or disclosed to Amol Kothadiya.

10. Outside Engagements

Employees shall not, without prior written approval, take up outside employment, directorship or business engagement that competes with, or impairs their duties to, the Company. Directors' other engagements are governed by their statutory disclosures.

11. Workplace Conduct

The Company maintains a workplace free of discrimination, harassment (including sexual harassment, addressed under the applicable POSH framework), intimidation and substance abuse. Covered Persons shall treat colleagues with dignity and respect, consistent with the Equal Opportunity Policy.

12. Communication and Public Statements

Only authorised persons shall speak for the Company to media, on public platforms, or in regulatory correspondence. No Covered Person shall make statements or social media posts that disclose confidential information or purport to represent the Company without authority.

13. Reporting Violations

Suspected violations of this Code, of law, or of Company policy shall be reported to the Board, through written channel. Reports may be made in confidence; the Company shall not retaliate against any person who reports in good faith.

14. Waivers, Enforcement and Discipline

Any waiver of this Code for a director or member of senior management may be granted only by the Board and shall be recorded. Violations attract disciplinary action up to termination of employment or engagement, and referral to authorities where the law so requires.

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15. Acknowledgement and Review

Every Covered Person shall acknowledge this Code on joining. The Code is reviewed by the Board annually.

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