



Remfry & Sagar
ATTORNEYS-AT-LAW

Anti-corruption, Ethics and Compliance Policy

ANTI-CORRUPTION, ETHICS AND COMPLIANCE POLICY

PURPOSE

Remfry & Sagar (the 'Firm') is committed to maintaining the highest standards of ethical business conduct as a fundamental part of its functioning. The Firm while promoting a culture of openness and trust ensures compliance with fair business practices.

This policy lays down principles to ensure ethical conduct. Effective ethics is a team effort involving the participation and support of every member of the Firm. All members should familiarize themselves with these guidelines on ethical conduct.

ESSENTIALS

The Firm follows an ethics and compliance process that communicates its commitment to uncompromising integrity in accordance with corporate values, and ensures compliance with all applicable laws, rules, and regulations.

Reputation for integrity is one of the most valuable assets of the Firm which has been built over years and is dependent on the integrity and sense of responsibility demonstrated by members of the Firm. The Firm exemplifies a high standard of ethical and legal conduct while rendering professional services.

The Policy mandates:

1. Honesty & fair dealing –Honesty, fairness, and keeping commitments are the hallmarks of the way we provide professional services.
2. Maintaining accuracy – Proper records be maintained; information must not be falsified or concealed under any circumstances and regular audit/s be conducted.
3. Protection of confidential information – It is necessary to ensure that confidential and proprietary information about the Firm and its clients is protected from improper use. Disclosure of such information within the Firm should be strictly on need-to-know basis. Disclosure to outsiders, except to comply with legal requirements, is not only unethical but may be illegal.
4. Forbidding unethical practices – All members of the Firm should be regularly sensitised against unethical business dealings, whether actual or perceived, even if such dealings may not violate applicable law. It is necessary to promote a healthy team environment and avoid the intent and appearance of unethical or compromising practices.
5. Open door policy – Senior members of the Firm should be approachable and welcome suggestions and concerns of all members. This will allow members to feel comfortable discussing any issues and will alert senior members to concerns within respective teams.

6. Maintaining ethics – It is the responsibility of each member of the Firm to apply effort and intelligence in maintaining ethics while rendering services and ensuring non-participation in unethical dealings of any manner whatsoever.
7. Conflict disclosure – Members must disclose any conflict of interest regarding their position within the Firm.
8. Promotion of ethical conduct – Promotion of ethical conduct within interpersonal communications of members should be encouraged and will be rewarded.
9. No impropriety – The Firm will not permit impropriety for any reason whatsoever.
10. Integrity is prime – No member shall use Firm's assets or business relationships for personal use or gain.

This Policy is to be applied in both letter and spirit. Any violation will be regarded as misconduct and may lead to disciplinary action.
