



Business Responsibility & Sustainability Policy

Version-1

Risk Management Department

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Business Responsibility & Sustainability Policy

BACKGROUND

Globally, there is an increase in awareness and activism amongst stakeholders who are demanding business accountability for the social and environmental impacts on issues such as climate change, gender equality, environmental degradation, etc. Sustainability Reporting is an emerging discipline encompassing the disclosure and communication of an entity's non-financial - environmental, social, and governance (ESG) performance and its overall impact.

India is one of the early adopters of sustainability reporting for listed entities amongst its various other global peers. India is increasingly seeking businesses to be responsible and sustainable towards their environment and society with increasing regulatory oversight and progressive market reforms. The market regulator, the Securities and Exchange Board of India (SEBI) mandated the top 100 listed entities by market capitalisation to file Business Responsibility Reports (BRR) as part of their annual report, as per the disclosure requirement emanating from the "National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business" (NVGs) in 2012. The requirement for filing BRRs was later progressively extended to the top 500 listed entities by market capitalisation in 2015 and the top 1000 listed entities in 2019. As a market-driven approach, integrated reporting has gained momentum after SEBI soft law passed in 2017 on voluntary adoption of Integrated Reporting by top 500 listed companies.

In March 2019, the NVGs were revised and released as the National Guidelines on Responsible Business Conduct (NGRBCs). Later, in 2020 the Committee on Business Responsibility Reporting of the Ministry of Corporate Affairs recommended that the Business Responsibility Report may be called the Business Responsibility and Sustainability Report (BRSR) to better reflect the scope of the reporting requirements. Subsequently, in May 2021, SEBI has introduced new reporting requirement called the Business Responsibility and Sustainability Report (BRSR) for sustainability reporting by listed entities with the intent towards having quantitative, qualitative and standardized disclosures on ESG parameters. The BRSR sets a significant step towards bringing sustainability reporting at par with financial reporting.

SEBI vide Circular no. SEBI/HO/CFD/CMD-2/P/CIR/2021/562 dated May 10, 2021 mandated the filing of Business Responsibility and Sustainability Report (BRSR) for the top 1000 listed companies (by market capitalization) replacing the existing BRR with effect from the financial year 2022-2023. The disclosures from listed entities as per BRSR relates to their performance against the nine principles of the 'National Guidelines on Responsible Business Conduct' (NGRBCs). Reporting under each principle is further divided into Essential Indicators and Leadership Indicators. The essential indicators are to be reported on a mandatory basis while the reporting of leadership indicators is on a voluntary basis. It is expected that listed entities endeavour to report the leadership indicators also.

The introduction of BRSR mandate by the SEBI is an inflection point in the Indian sustainability reporting scenario which provides an opportunity for the entities to embed sustainability in the core strategy. Such disclosures shall also enable entities to engage more meaningfully with their stakeholders, by encouraging them to look beyond financials and towards social and environmental impacts. Further, companies will be able to better demonstrate their sustainability objectives, position and performance resulting into long term value creation.

INTRODUCTION

Can Fin Homes Limited ("CFHL" or "Company") is registered with National Housing Bank (NHB) as Housing Finance Company. CFHL designs its products and services in a manner that creates value to customers.

The Company believes in doing Business with moral values and principles and the Company has integrated its business and values to meet the expectations of its customers, employees, investors, stakeholders and society at large. The Company provides and maintains clean, healthy and safe working environment and strives to enhance standards of service delivery to customers. The main objective of the Company is by itself a big social responsibility of helping people to have a home of their own by providing loans for construction and/or purchase of dwelling units at competitive interest rates.

The Company does not carry-out any manufacturing activity, therefore reporting resource use of energy, water and raw material per unit of product may not be applicable. However, it may be pertinent to mention that the Company minimizes the consumption of electrical energy and natural resources under its green initiative, has installed solar power in some branches and has also been ensuring minimum usage of paper.

Our Company's approach to sustainable growth is built on the belief that it can strengthen its business while also valuing the environment and its ecosystem. CFHL aims to achieve more sustainable outcomes as well as partner with customers, society and governments towards the achievement of the sustainable development goals. The Company believes that business success and sustainability-driven decisions go hand in hand and depends on the passion of its employees, shareholders and customers.

As an organization, CFHL aims to align its ESG approach with its strategic goals and the experience the Company seeks to offer all our stakeholders. ESG is an area of heightened focus and investment for us and has changed our outlook towards the business. This policy framework elucidates the Company's approach to align its business strategy, processes and disclosures with national and international ESG standards and frameworks.

OBJECTIVE

The objective of the Policy is to articulate Company's commitment towards Environment, Social and ethical governance practices and long-term value creation for internal and external stakeholders of the Company viz., customers, employees, investors, regulators, business partners, community members, etc.

The policy will also serve as a guide for their implementation and will provide an inclusive, safe and healthy working environment and promote the well-being of all the stakeholders. The purpose of ESG Policy is to drive the Company's ESG strategy and integrate it with the core business strategy.

ESG POLICY STATEMENT

In order to demonstrate the approach and commitment to ESG principles, the Company is committed to:

- a) Maintain an effective governance mechanism.
- b) Create a framework of ESG linked policies.
- c) Comply with all relevant and applicable ESG statutory rules and regulations.
- d) Assess the impact of the Company and its alignment of ESG related risks and opportunities with its business model and strategies.
- e) Maintaining a high level of social and ethical conduct within own operations and

communicate our ethical standards to the customers, third parties, investors and general public.

- f) Embrace key international ESG standards and guidelines, relevant to our business and jurisdiction and strive to adopt best practices.
- g) Allocating resources towards training the employees on ESG policy and commitments.
- h) Ensuring organization-wide culture aligned to our ESG policy.
- i) Ensuring workforce policies and practices are consistent with the company's values and supporting its long-term sustainable success.
- j) Funding environment friendly projects and strive to promote sustainable environment and;
- j) Monitoring of performance.

ESG GOVERNANCE

The overriding ESG approach is linked to the primary objective of the Company, which is enabling Indians to become homeowners.

Given the increasing focus and rising stakeholder expectations on ESG coupled with the fact that this is still an evolving space with varying standards and frameworks, at this juncture, the Company has opted to rely on the collective expertise of the entire board of directors of the Company for oversight of the ESG framework.

The Board of Directors of the Company has entrusted the responsibility of Company's action plan and implementation and oversight of various Environment, Social and Governance aspects in the Company, in the context of Business Responsibility and Sustainability to the Risk Management Committee of the Board.

The executive directors of the Company i.e., the Managing Director and the Deputy Managing Director/whole-time director in charge of business responsibility and sustainability are collectively responsible for the vision, strategy and implementation of the ESG framework of the Company. The Executive Directors have the overall responsibility of monitoring ethics, transparency, compliance and human capital. Monitoring Human Capital including employee engagement, retention, recruitment, succession, planning, talent development, corporate culture, diversity, equity, and inclusion, health, safety and compensation programs etc.

Further, the internal Committee on ESG shall comprise the Chief Financial Officer, Risk Management Head, Compliance Head, Products & Strategy Head, Credit Head, HRM head, Premise Head and the Company Secretary. This Committee shall assist the Risk Management Committee of the Board in all respect for implementation of the BRS policy & framework.

Quorum & Compulsory attendance of Members of the internal Committee: Quorum will be at least 50% of the number of members in the committee. The Head of Risk Management Dept., CSR Dept., Compliance Dept. and HR Dept. have to be present in the meeting to form the quorum.

Periodicity of meetings: At-least once in a quarter.

Roles & Responsibility of the Committees:

- The committee shall be responsible to evolve & frame the Business Responsibility and Sustainability Policy & Framework
- The Committee shall identify the roles and responsibilities of each of the stakeholders in formulating the Company's ESG policy & framework and training requirements.
- Committee shall also review the timely implementation of ESG framework in the Company.
- The Committee shall work with innovative ideas and deliberate in detail, the feasible

- solutions to overcome the hurdle of implementing ESG framework in smooth manner.
- Identifying opportunities, target setting for improvement in the areas of emissions, energy usage, water security, waste management and harnessing renewable energy sources.
- Scaling up work place matters relating to Human Rights, ethical behavior and Code of Conduct, Grievance handling, gender diversity, training and development, corporate governance practices and stakeholder engagement.
- Identifying business opportunities to make products and services more inclusive by suggesting introduction of new products and services and meeting the Social aspirations and addressing concerns on environment protection and climate risk.
- Suggest action plan towards reduction in resource utilization, like digitization of internal communication, credit processing proceeds and other such practices which can contribute to the ESG drive of the Company.

KEY FOCUS AREAS FOR ESG

A. Responsible financing

The Company is committed to create a positive impact through its business founded on the values of respecting human life and addressing the challenges to the environment. In this regard, the Company supports capacity creation in sustainable sectors like renewable energy, waste management and energy efficiency. The Company will be aligned to national goals and targets in the nation's collective transition to a low-carbon economy. Company has a Policy on Responsible Advocacy provided under Annexure-I which specifies the guidelines followed by the employees and others partners & associates in the advocacy activities with internal and external stakeholders.

B. Environmental sensitivity in the Company's operations

The Company is committed to conduct its business sustainably and efficiently, thereby reducing the environmental impact in its facilities. The key areas of focus are digitization, energy conservation, water conservation, waste management and sustainable procurement. The Company invests in providing digital solutions to customers and encourages their adoption, thereby reducing usage of paper. The Company also promotes digitization of internal work and operations.

The Company invests in maintenance of sustainable and green workplaces wherever feasible. The Company focuses on using energy efficient lighting and equipment at its branches and offices and deploying equipment capacity optimization measures, The Company will aim to increase use of renewable energy sources wherever feasible.

The Company will work towards setting a time bound quantitative target for reduction in emissions/reduction in emissions intensity/carbon neutrality.

Water conservation is a crucial part of sustainability. The Company will work towards effective water management.

The Company has a process in place for handing over of e-waste to authorized agencies.

The Company will strive to deploy sustainable procurement practices that are integrated across the organization and across the value chain. This will include conservation of natural resources, minimum or no use of hazardous or toxic substances, compliance to local/ national regulations.

C. Climate Change Strategy

Energy & Emissions: To combat climate change and transitioning to a low carbon economy, we will strive to reduce our carbon footprint by taking on initiatives to monitor and reduce our energy consumption. Our initiatives will be aimed at:

- Installing LED lights across all offices and Branches which consumes less power
- Procurement of Energy Saving Green IT Equipment's
- Implementing automated energy management solutions to reduce energy consumption
- Retrofitting existing high energy consuming devices and equipment to maximize performance while consuming less electricity
- Disposal wastage IT assets in an environment friendly way.

Waste Management: The Company shall make efforts to dispose waste in the most responsible manner. The IT wastes to be outsourced to vendor which can dispose-off the wastes as per proper waste disposal mechanism. Also, the old papers and documents are scrapped in such a manner such that they may be recycled.

The Company is conscious of paper usage in its operations, transactions and customer communications. Our push to go digital would help to reduce paper consumption, thereby reducing paper waste. Printing and photocopying operations by employees across offices and branches will also continue to be monitored and regulated in order to reduce wastage of paper. The Company has introduced e-Board/ Committee meetings which are conducted in a completely paperless manner thus making significant efforts to reduce the consumption of resources, specifically paper, wherever it can.

The Company discourages usage of plastic cups, bottles and straws for beverages and instead has distributed ceramic coffee mugs to all the employees and reusable cutlery is used in cafeteria. The Company will strive to reduce the use of all forms of plastic in its offices, branches as well as in its promotional, marketing and outreach events.

D. Our Customers

We recognize that maintaining the trust and regard of our customers is important for Company's success and longevity. CFHL defines "engagement" as "the process of encouraging people to be actively involved and associated with Can Fin Homes. The Customer Engagement Policy is provided in the Annexure-II.

CFHL believes that a satisfied customer is the most important factor in developing our business. The Company has a "Customer Grievance Redressal Policy" that outlines the framework for addressing customer grievances.

E. Managing employee relationship and ethical working conditions

Non-Discrimination & Fair Treatment: We believe that satisfaction of employees is critical to the long-term success of the Company. Company provides fair and equal employment and advancement opportunities to all the employees and there will be no discrimination on the basis of race, caste, color, age, sex, disability and socio-economic status of the candidate. We ensure a fair recruitment process that helps us to identify and hire people with the right values, who are then groomed, encouraged and retained through a combination of financial and non-financial incentives. CFHL strives to foster a supportive and understanding environment in which all individuals realise their maximum potential regardless of their differences and where everyone can feel a sense of belonging. The Diversity & Inclusion policy is provided in the Annexure-III.

CFHL is an equal opportunity employer and the policy on Equal Employment Opportunity is provided in the Annexure-IV.

Remuneration and career progression: The Company's endeavor is to provide emoluments as per industry standards to the employees and fair opportunities for the employees for filling in higher roles. The Company has a succession planning process and measures the depth of leadership bench at the Senior Leadership levels. The succession planning policy of the Company is given in the Annexure-V.

Employee Health & Well-being: The Company is committed to continue to take steps to promote a safe and conducive work environment for its employees and will provide guidance on health and safety. Appropriate medical cover is provided to all the employees.

Employee Ethics & Code of Conduct: The Company also has a staff service regulations and online portal on human resources. It has a Code of conduct, which covers all aspects pertaining to employment and encourages principles of ethics, transparency, accountability and good corporate practices. Further, the Company arranges training programs, conducts seminars for employees to abide by the Company's policies in true spirit. The Anti-bribery and Anti-Corruption Policy ("Policy") of Can Fin Homes Limited ("CFHL") has been developed in alignment with CFHL's code of conduct for employees, various policies including whistle blower policy, rules and regulations adopted by CFHL and is provided under Annexure-VI.

Women Safety: The Company is committed to a workplace for women which is free of harassment or discrimination and has in place a mechanism for dealing with complaints on harassment or discrimination. Complaints, if any, will be addressed effectively with utmost sensitivity and confidentiality. The Company has a Policy on Prevention of Sexual Harassment as provided in the Annexure-VII.

Training & Development: The Company believes that its employees are its most valued resource and hence, has always ensured their all-round development through regular training programs. There Human Resources Department ensures that employees are sufficiently trained in functional and behavioral skills, key processes and procedures, adoption of best environmental and sustainability practice, customer service standards, underwriting process, collection, credit disbursals, to ensure high standards of service to internal and external stakeholders and identify, promote and realize the adoption of best environmental and sustainability practice at all levels.

Safety at work: In the endeavor to provide a safe work environment, the Company has a comprehensive suite of benefits, including insurance cover to employees and specially designed policies to meet the life-stage needs of women such as maternity leave, etc.

F. Society

Guided by the principle of inclusiveness and equal opportunity, the Company has a long-standing commitment towards creating a positive impact on marginalised segments of society. Company is engaged in activities in the areas of skill development, rural livelihoods and value chain development, creating sustainable economic ecosystems at the village level and undertaking environmental and social projects that address critical developmental gaps. The Company will continue to focus on CSR in compliance with applicable laws and regulations.

Being a provider of financial services, enabling access to finance to the socially marginalised segments of society will continue to be a part of its lending activities.

The Company strives to ensure that suppliers do not engage in any activities that are related to violation of human rights, child labour or forced labour. The Human Right statement is provided in the Annexure- VIII.

G. Good Governance practices

We are committed to maintain the highest levels of ethical standards of integrity, corporate governance and regulatory compliance. These parameters form the bedrock of our corporate governance policy. We have proactively upheld good governance practices and are constantly striving to enhance our standards. Our Board of Directors is responsible for setting the course for, and evaluating the Company's performance with regards to corporate governance. The parameters of evaluation include compliance, internal control, risk management, information and cyber security, customer service, social & environmental responsibility.

The Company's corporate governance framework complies with the Indian companies Act, the regulations and guidelines of the Reserve Bank of India/National Housing Bank, the Securities and Exchange Board of India ("SEBI") and the requirements of the listing agreements entered into, with the Indian stock exchanges.

CFHL follows fair play rules by following ethical practices while doing business. The Fair Competition policy of the Company is provided under Annexure-IX.

H. Procurement Practices

The Company recognizes the need to work closely with our suppliers to reduce waste, improve efficiency, reduce carbon footprint and engage with them to understand their commitment towards human rights and labour practices. We will thus continue to work towards greater integration of environmental & social considerations in our procurement practices.

I. Cyber security and data privacy governance framework

The Company's cyber-security and data privacy governance encompasses management oversight at various levels through Executive Committees, Information Technology Strategy Committee of the Board with the ultimate responsibility assumed by the Board of Directors. The Company follows a comprehensive 360-degree approach to cyber security with the triad of Confidentiality, Integrity and Availability (CIA) at the heart of the information security framework. The approach covers all aspects of prevention, detection and response.

J. Stakeholder engagement and accountability

The Company believes in maintaining a transparent relationship with its stakeholders and holds regular interactions with them, including investors, employees, customers and regulators. The Company seek to enhance its practices and disclosures on ESG, with a focus on the material topics identified by stakeholders, on an ongoing basis.

By means of the Whistle Blower policy, the Company will continue to empower and encourage various stakeholders including employees, customers, suppliers, vendors, shareholders and other stakeholders to bring to the notice of the Company, any issue involving compromise/ violation of our code of conduct/ ethical norms, legal or statutory provisions without fear of reprisal, retaliation, discrimination or harassment. Chairman of Audit Committee addresses these concerns by initiating a thorough enquiry conducted by the appropriate authoritative body within the Company. The stakeholder engagement policy is provided in the Annexure X.

ESG DISCLOSURES & REPORTS

The Managing Director and during his absence the Whole Time Director of the Company are the key persons for implementation of ESG initiatives.

The reporting format prescribed by SEBI named 'Business Responsibility and Sustainability Report' (BRSR), aims to establish links between the financial results of a business with its ESG performance. This can make it easier for regulators and investors and allied stakeholders to obtain a fair estimate of overall business stability, growth and sustainability. As per existing regulatory framework the Company shall prepare w.e.f. 2022-23, the Business Responsibility & Sustainability Report on annual basis which should form part of the Annual Report of the Company and shall be displayed on the website of the Company.

We will drive the implementation of our policy through widespread awareness and concrete actions, while being open to continual improvement. We believe that the policy serves as a strong foundation for seamless integration of our marketplace, workplace, environment, and community concerns with Company's business operations in order to support the larger goal of sustainable development.

We shall communicate this policy to all stakeholders and ensure it is available to the public to ensure effective implementation of the same.

We shall review the ESG Policy and allied management systems annually to ensure their continuing applicability and relevance to our operations and evolving stakeholder expectations. Mid-term review can be made as and when required.

Responsibility Advocacy Policy

Advocacy refers to the activities performed while interfacing with a wide range of stakeholders such as Government agencies, non-governmental organisations, academic and research institutions, associations at a local, national, and international levels and individuals with the objective of influencing policy, regulations and other decision making endeavours.

Can Fin Homes Limited (CFHL) believes that it is necessary to represent and engage with authorities on matters concerning the various sectors in which it operates. CFHL's engagement with the relevant authorities is guided by the values of commitment, integrity, transparency and the need to balance interests of diverse stakeholders.

The Policy on Responsible Advocacy specifies the following critical and necessary guidelines to be followed by all employees, relevant contractors engaged by CFHL and all partners & associates in all advocacy activities with internal and external stakeholders:

1. Achieve total compliance with all applicable regulations pertaining to advocacy activities with the Government, non-governmental organisations, industry associations, and individuals.
2. Focus on transparency, accountability, strong corporate governance standards and ethical guiding principles in all advocacy interactions.
3. Ensure adherence to anti-corruption guidelines/policy (available on CFHL's website) in all stakeholder interactions and implement record management tools
4. Implement grievance redressal mechanisms to support the investigation of any instance of non-compliance with this policy
5. Undertake appropriate disciplinary action against any proven instance of non-compliance with this policy.

This Policy applies to all employees of CFHL, members of CFHL's Board and CFHL's contractors when acting on CFHL's behalf such as agents, public affairs, communications and legal consultants, outsourced personnel, and other third-party representatives.

The policy shall be reviewed periodically for its appropriateness and updated as and when, necessary.

Customer Engagement Policy

Under this Policy CFHL defines “engagement” as “the process of encouraging people to be actively involved and associated with Can Fin Homes.

CFHL is aware of the on-going legal responsibilities as per the laws of our country. The main focus of the policy is to ensure that customer voice is heard at every level of the organization, both on a formal or informal basis, as individuals or as members of groups, at a level that is comfortable and at a pace that can be determined.

Acquiring a new customer is much costlier than retaining an existing one and hence, it is essential to build customer engagement and loyalty. This can be achieved in the following ways:

- Deciding the range of ways for customers to become associated with CFHL for existing and future service quality and standards.
- Relationship based on openness, honesty, and transparency.
- Use of digital channels and emerging technologies correctly.

CFHL should consider customers’ views if found viable and feasible, while making decisions across all aspects of service delivery and ensure that the outcome from customer engagement is reported through our governance structure and back to all our customers.

CFHL needs to understand the need, requirements and experience of the customers to consider the same. This applies to the process of customer engagement as much as it does to the services provided by us. There may be barriers that get in the way of effective engagement. In order to involve and include more customers, CFHL needs to identify ways to widen access for catering to their different requirements and interests.

CFHL to undertake periodic survey exercises to give some insights about the satisfaction with its services, as a starting point. The survey to elicit information about its customers with regard to experience of its services that have been delivered.

Customer feedback via electronic media will facilitate CFHL to gauge their views and response for taking corrective steps, wherever necessary.

Events– Events may be held to promote a service, support environmental improvements, provide information, to consult on a major issue or for social/community reasons.

CFHL understands that clear and timely information is key to establishing a trustworthy relationship with customers.

All prevailing regulatory/legal/statutory compliances, as applicable and modified from time to time need to be adhered to within the prescribed time frame, if any.

The Policy shall be reviewed periodically for its appropriateness and to be updated as and when found necessary.

Diversity and Inclusion Policy

Can Fin homes limited ("CFHL") aims to create an inclusive workplace and leverage the power of diversity for sustainable competitive advantage, economic growth and societal progress. Employees from different backgrounds should be able to function without any barriers and with equal opportunities to participate, develop, contribute freely and equitably.

The objective of this policy is to:

1. To ensure that CFHL continues to be an employer for all diversity groups- gender identity, disability, caste, creed, colour, religion, marital status, age, sexual orientation and expression, medical condition, language and any other aspects as applicable.
2. To create an environment which has zero tolerance for discrimination. Discrimination against any employee on any of the above grounds is prohibited and equal prospects are made available.
3. To create and foster an open culture of inclusion for all its stakeholders, including all employees (whether permanent, fixed term or temporary), business partners, vendors, suppliers, consultants, contractual staff, trainees, direct selling agents, and any other person / entity acting directly or indirectly for and on behalf of CFHL.

The basis for recruitment, development, training, compensation and advancement of employees at CFHL shall solely be on the basis of qualifications, performance, skills, experience, expertise, potential, discipline and there shall be no other extraneous criteria of differentiation.

CFHL follows the principle of equal pay and terms of employment (including benefits, training, promotions, performance reviews, transfers, exits, etc.) without any bias. CFHL believes that all its employees should receive equal pay where they are carrying out similar work, work rated as equivalent or work of equal value.

All employees and stakeholders of CFHL shall be always treated with dignity and respect. There is no tolerance for disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment (physical, verbal or mental harassment) is not tolerated in the workplace and in any work-related circumstances outside of work.

CFHL inculcates awareness amongst its employees through educational sessions and forming internal groups to promote diversity amongst employees.

Appropriate disciplinary/ legal action will be taken against any employee / personnel who violates this policy. Based upon the seriousness of the offense, disciplinary action against an employee may include verbal or written reprimand, warning, suspension or termination of employment.

No reprisal or retaliatory action will be taken against any individual for raising concerns as regards this policy. However, any such reporting by an employee if found to be in bad faith or in a false or frivolous manner, will be considered a violation of the code of conduct, and such employee may be subject to disciplinary action.

CFHL respects the privacy of every individual and ensures utmost secrecy and confidentiality of information / concerns in relation to disability/ sexuality/ gender identity or any other personal information shared with it by its employees (or potential candidates). However, if any disclosure is mandated under law, then any such disclosure will be handled with utmost confidentiality and in accordance with applicable laws.

Equal Employment Opportunity Policy

INTRODUCTION:

Can Fin Homes Ltd. is a housing finance company registered under the Companies Act, 1956 and carrying on the business of giving loans for purchase of sites/houses/flats and for construction of houses, flats etc. The Company is an Associate Company of Canara Bank, a public sector undertaking, where 70% of the shares of the Company are held by the public. The company has been granted certificate of Registration under Section 29A of National housing bank Act, 1987. The Company is listed on National Stock Exchange of India (NSE) and BSE Limited.

The Company, being a private establishment within the meaning of Section 2(v) of the Rights of the Persons with Disabilities Act, 2016' (RPwD Act) and rules thereunder, aims to create employment at all levels without any discrimination whatsoever.

The Company has been providing equal employment opportunities without any discrimination on the grounds of age, color, disability, race, caste, sex and religion.

This Policy is applicable to Can Fin Homes Ltd. employees and its operations. The Company shall ensure that systems and processes are in place on the following:

(a) Facility & amenity provided to the persons with disabilities:

To treat differently abled persons equally with its other employees, to provide appropriate facilities and amenities to persons with disabilities to enable them to effectively discharge their duties in the establishment.

To provide the facilities & amenities, relating to accessibility & movement including for drinking water, toilet, parking, seating arrangement etc., priority in handling the issues / matters concerning PwDs.

(b) List of posts identified suitable for persons with disabilities in the Company.

To identify the posts suitable for persons with disabilities in the Company. Accordingly, the PwDs, found suitable and required numbers, are identified for recruitment in the post / cadre of Assistants & Junior Officers and to place them at Offices, to enable them to comfortably / conveniently attend & discharge their duties / works. The nature of works suitable like relating to Accounting; Processing of papers, etc., which may be revised from time to time may be considered. The Managing Director / Deputy Managing Director (in the absence of the Managing Director) is authorized to identify the suitable posts for persons with disabilities from time to time.

(c) The manner of selection of persons with disabilities for various posts:

To give equal opportunity to the persons with disabilities, if found suitable, at all stages of employment in the Company, including recruitments, selections and promotions and also to participate, perform and excel in their work on an equal basis in everyday life.

A column in the Application form for the above process is provided seeking information if the applicant is a person with disability and if so, nature of disability and specific needs, if any.

(d) Post-Recruitment and pre-promotion Training facility:

To organize Training programs from time to time for upgradation of their skill with regard to their employment, based on requirement. Also, to provide Pre- Promotion and post-promotion training to such PwDs, depending upon their requirements.

(e) Preference in Transfer and posting:

To Provide preference in transfer and posting, subject to their suitability and availability. The exemptions from mandatory serving / compulsory transfers as per H R policy shall also be looked into, keeping in view the convenience of PwDs & administrative exigencies.

(f) Special Leave, preference in allotment of residential accommodation if any, and other facilities:

To provide Special leave, Preference in allotment of residential accommodation, if any, and other facilities to PwDs.

(g) Provisions for assistive devices, barrier-free accessibility:

To provide an accessible environment and availability of assistive devices, subject to regulatory guidelines, availability of devices, administrative constraint, as required. To specify, providing crutches; specially made shoes; wheel chairs etc., depending upon the requirement.

(h) Appointment of Liaison Officer by the Company:

To appoint a Liaison officer and to designate him / her to oversee the provision of required facilities/amenities, including the process of recruitment for persons with disabilities. Executive in the cadre of Asst. General Manager or above shall be the Liaison Officer for the purpose.

The above Liaison Officer shall be the Grievance Redressal Officer for the purpose. He/she shall be the designated authority to oversee the provision of required facilities/amenities including the process of recruitment of persons with disabilities. He shall also be empowered/authorized to implement/lay down operational guidelines to ensure that the applicable provisions of the RPwD Act and rules. The provisions/such guidelines shall be subject to the provisions under CFHL Staff Service regulations, the qualifications and merit of the individual.

The Managing Director or the Deputy Managing Director in the absence of the Managing Director shall be the Final Authority to nominate any other Executive / Official and his decisions will be binding on the Issues/matters relating to PwDs.

This Policy along with the required details of the Liaison Officer shall be displayed in the website or at any conspicuous place in the Registered Office premises.

RESPONSIBILITY:

Every employee of the Company is responsible to give effect to this policy. If any employee violates this Policy, or discriminates any person with disability, or renders any harassment to such person, he/she shall be dealt with under the provisions of the Service Regulations of the Company.

The Company shall maintain records of the persons with disabilities in relation to matter of employment, facilities provided and other necessary information in compliance with the provisions of this policy.

MAINTENANCE OF RECORD [Physical / Electronic]

(Pursuant to Rule 9 of R PwD's Act, 2016 and related Rules)

Sl. No.	Name	Address and Phone No.	Gender	Date of Birth	Joining Date	Nature of Disability	Nature of the Work	Facility Provided
Total No. of Persons with Disabilities employed under Can Fin Homes Ltd.								

Succession Planning Policy

1. Background:

Succession planning refers to the process of filling positions at the senior level in the organisation such as Board, Senior Management and other key roles. Identification, assessment of their potential and development of suitable candidates for the said roles is the objective of succession planning. Essentially, the concentration is on training and mentoring them to take up higher responsibilities, when required, to facilitate smooth succession without hindering the operational efficacy of the institution.

The Policy of Succession planning envisages the strategy of continuously grooming the employees in consonance with their skills and talent to mitigate attrition related risks like Vacancy, Readiness and Transition.

As per the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors should oversee the succession planning and ensure that plans are in place for proper succession of appointments for the Board and the Senior Management.

2. Applicability:

The main focus of the Policy will be on the Succession Planning at the Board and Senior Management level.

"Executive Board" shall mean and include Whole-time Directors appointed by the Board/ Shareholders.

'Senior Management' shall mean and include the following: Management Executives (i.e., employees one level below the Board), KMPs (other than whole-time director); Chief Investor Relations Officer, Chief Information Technology Officer; Chief Risk Officer and any other person at the discretion of the Nomination and Remuneration Committee ('NRC').

3. Objectives:

1. To ensure that the business of the Company is not adversely affected or hampered on account of superannuation, voluntary retirement, resignation, death or permanent incapacitation or sudden exit of any Member of the Board, Senior Management or any other employee covered under this Policy.
2. To create a talent pool of high potential personnel, who will be suitable for appointment at the Board and Senior Management positions and to groom them to assume specific roles as and when required.
3. To ensure qualitative and timely replacements for high level personnel in the Board and Senior Management levels.

4. Implementation Process:

A. Positions at the Directors level:

The responsibility of ensuring timely replacement for positions of any Director, lies with the NRC Committee.

For vacancies in the Executive Board, the NRC in consultation with the Chairman and other Members of the Executive Board, shall recommend the name(s) of the candidate(s) (whether internal or external) who have the necessary qualifications, qualities and traits for such position(s).

For other vacancies in the Board, the NRC shall identify and recommend name(s) of the candidate(s) with requisite qualifications and characteristics for being considered for such position(s).

The NRC shall undertake a process of due diligence to determine the suitability of the person for appointment / re-appointment / continuation as a Director on the Board, based upon qualification, expertise, track record, integrity and other 'fit and proper criteria.

In the event of any unexpected vacancy in the Executive Board, NRC shall meet and appoint from the identified pool of persons to take charge of the said position either on an interim basis or on permanent basis.

B. Positions at the Senior Management and other critical positions:

The Executive Board should review the vacancies, if any, at Senior Management level and other critical positions at least once a year. On the basis of such requirements, an appropriate action plan should be drawn and adopted.

Such action plan, in the first instance, should consider the identification and short listing of an employee within the same location/function through a lateral transfer of an employee from another location/function. In case of non-availability, alternatively, the plan should consider selection of an external candidate having the required skills, experience, leadership quality and expertise, necessary for the said position.

The Executive Board should ensure that the external candidate fits into the work culture and ethics of organization and also has the ability to lead the team by example, work and motivate them, have a congenial rapport with the Members of the Senior Management and other staff members.

It is also imperative to have a contingency plan in place to deal with sudden exits at the said Senior Management level. The Human Resource Department of the Company should identify a select pool of employees who can be trained to occupy senior level positions in case of any such eventuality for handling responsibilities.

In addition to the above indicated key positions, there should be succession plans for the functional business heads like the Cluster and Branch Manager and the persons heading / handling various departments/ sections in the Registered Office, as well.

Succession planning entails the following:

Identification of employees who possess the potential needed for assuming the higher rungs of leadership within their branch/ department.

Outline the plan of action in reasonable span of 6 months to a year in order to prepare and groom identified staff to assume and discharge elevated responsibility in the future.

Based on the above review process, the Executive Board should give its consent to implement the succession plan for the concerned Region/Branch/Function, within a definite time frame.

Executives and concerned officials responsible for execution of the Succession Planning Policy should ensure confidentiality in respect of the discussions and decisions regarding the prospective candidate. The information should be shared, if and when required, only with the concerned candidate, in order to prepare him for such elevation.

Amendments and modifications to this Policy may be made from time to time to be in conformity with the regulatory guidelines, listing regulations or Board directions from time to time.

Anti-Bribery and Anti-Corruption Policy

The Anti-bribery and Anti-Corruption Policy ("Policy") of Can Fin Homes Limited ("CFHL") has been developed in alignment with CFHL's code of conduct for employees, various policies including whistle blower policy, rules and regulations adopted by CFHL.

The Policy emphasizes CFHL's zero tolerance towards bribery and corruption malpractices and reflects its commitment to maintain highest ethical standards undertake open and fair business culture, follow the best practices of corporate governance and enhance CFHL's reputation at appropriate levels.

The Policy provides necessary information and guidance on how to recognize and deal with bribery and corruption issues. It applies to all stakeholders, or any other person associated with CFHL such as individuals, directors, employees working at all levels and grades (whether permanent, contractual, or temporary), consultants, contractors, trainees, casual workers, agency staff, interns, agents, business partners, vendors, service providers, suppliers, who may be acting directly or indirectly on behalf of CFHL.

Bribes or illegal gratifications made in the form of money or anything of value, in return to a person holding a position of authority, for a business favour or advantage.

With respect to Bribes:

- CFHL prohibits all forms of Bribery and corruption practices.
- CFHL conducts its business lawfully and ethically and also expects every stakeholder to conduct its business with integrity.
- CFHL prohibits giving or accepting of any kind of favours to facilitate or expedite official business or work.
- CFHL may make charitable donations that are legal and ethical as per rules, powers and practices, duly ensuring that the charity or a support is for a legitimate cause and that donations are not being used as a channel for Bribery.
- CFHL does not make contributions to any political party or politicians. Stakeholders must not use CFHL's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of CFHL.

Illustrative list of acts / practices that are restricted / prohibited under this Policy shall include but not be limited to:

- Dishonest misappropriation of property/money, criminal breach of trust and cheating, as defined under Indian Penal Code 1860 ("IPC");
- Receiving or giving bribe.
- Acceptance / giving of gifts over and above the extent and the manner as provided under the Company Rules / Regulations.
- Charity in order to obtain commercial advantages.
- Participation / contribution in / to political activities.
- Any other unethical act or omission.

CFHL shall keep books, records and accounts in reasonable detail that accurately and fairly reflect all transactions and disposition of CFHL's assets.

CFHL shall maintain internal controls to prevent and detect potential violations of this Policy.

All Stakeholders are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy on hrm@canfinhomes.com.

CFHL will investigate all allegations relating to corruption and Bribery and take legal/disciplinary action as may be deemed appropriate.

Any use of the reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of the code of conduct, and the reporter may be subject to legal/disciplinary action.

CFHL ensures that it has adequate procedures to combat threats relating to bribery and corruption. Accordingly, CFHL provides appropriate training for its employees on prevalent anti- bribery & anti-corruption laws, their role and importance.

A copy of this Policy is available on CFHL's website, www.canfinhomes.com

Prevention of Sexual Harassment in workplace Policy

A. **Introduction:**

This Policy is framed in accordance with the provisions of 'The Sexual Harassment of Women at Workplace Act, 2013' and rules framed thereunder. Any clarifications pertaining to the policy, reference shall be made to the Act and rules enacted by Government of India.

We as a Company promote Gender equality among our employees and will not tolerate or entertain any form of harassment or discrimination lashed out at the women who are employed permanently or for a probationary period or on a contract basis.

The 'Policy on Prevention of Sexual Harassment of Women at Workplace' intends to provide protection against sexual harassment of women at workplace and prevention and redressal of complaints of sexual harassment and matters related to it.

B. **Scope and Coverage:**

This policy is applicable to all Employees of the Company. This policy considers right to life with dignity and the fundamental right to carry on any occupation, trade or profession, which depends on the availability of a 'safe' working environment where women employees feel secure and truly believe that their dignity is maintained.

All such acts which comes under the definition of sexual harassment shall be covered under this policy and all inquiries shall be tried at Registered Office.

C. **Definitions:**

1. **Sexual Harassment:** It includes any one or more of the following unwelcome acts or behavior (whether directly or by implication) namely:
 - a. Physical contact and advances; or
 - b. A demand or request for sexual favors; or
 - c. Making sexually coloured remarks; or
 - d. Showing pornography; or
 - e. Any other unwelcome physical, verbal or non-verbal conduct of sexual nature.
 - f. Physical contact and advances such as touching, stalking, sounds which have explicit and /or implicit sexual connotation/overtones, molestation.
 - g. Display of pictures, signs etc. with sexual nature/ connotation/ overtones in the work area and work related areas.
 - h. Verbal or non-verbal communication which offends the individual's sensibilities and affect her/his performance and has sexual connotation/ overtone/ nature.
 - i. Teasing, innuendos and taunts, physical confinement and /or touching against one's will and likely to intrude upon one's privacy.

The following circumstances, among other circumstances, if it occurs or is present in relation to or connected with any act or behavior of sexual harassment may amount to sexual harassment

- Implied or explicit promise of preferential treatment in the employment.
 - Implied or explicit threat or detrimental treatment in the employment.
 - Implied or explicit threat about the present or future employment status.
 - Interference with the work or creating an intimidating or offensive or hostile work environment.
 - Humiliating treatment likely to affect health or safety.
 - An alleged act of Sexual Harassment committed during or outside of office hours falls under the purview of this policy.
2. **Aggrieved woman:** In relation to a workplace, a woman, of any age, whether employed or not alleges to have been subjected to any act of sexual harassment by the respondent.
 3. **Respondent:** A person against whom a complaint of sexual harassment has been made by the aggrieved woman.
 4. **Employee:** A person employed at the workplace, for any work on regular, temporary, ad-hoc or daily wage basis, either directly or through an agent, including a contractor, with or without the knowledge of the principal employer, whether for remuneration or not, or working on a voluntary basis or otherwise, whether the terms of employment are express or implied and includes a coworker, a contract worker, probationer, trainee, apprentice or by any other such name.
 5. **Workplace:** In addition to the place of work [Head office / Branch offices] it shall also include any place where the aggrieved woman or the respondent visits in connection with his/her work, during the course of and/or arising out of employment/ contract/ engagement with Can Fin Homes Ltd.
 6. **Employer:** A person responsible for management, supervision and control of the workplace. For the purpose of this definition, the employer of the Company shall be the Managing Director.

D. Internal Complaint Committee:

- I. The Managing Director of the Company shall constitute an Internal Complaint Committee (ICC). The ICC shall comprise the following:
 - Equal representation of men and women on the ICC where one half of the total members are women.
 - A senior level woman Employee shall be appointed as the Presiding Officer of the ICC preferably a lady Executive, in any case
 - Minimum two members of the ICC will be appointed from amongst employees who are preferably committed to the cause of women or who have had experience in social work or have legal knowledge in this field.
 - One member may be considered from amongst non-governmental organizations or associations committed to the cause of women or a person familiar with the issues relating

to Sexual Harassment such member shall be paid a honorarium of Rs.2500/- on disposal of each complaint.

- II. The Presiding Officer and every member of the ICC shall hold office for a period not exceeding three years, from the date of their nomination.
- III. If the Senior Level woman employee is not available, the presiding officer shall be nominated from any other workplace of the same employer or other department or organization.
- IV. A member of the ICC may resign at any time by tendering his/her resignation in writing to the Company.
- V. The current nominated members of the committee are given in Annexure A.

E. Procedure of Lodging the Complaint:

- I. The complainant needs to submit a detailed complaint, along with any documentary evidence available or names of witnesses, to any of the committee members at the workplace.
- II. The complaint must be lodged within **3 months** from the date of incident/ last incident. The Committee can extend the timeline by **another 3 months** for reasons recorded in writing, if satisfied that these reasons prevented the lodging of the complaint.
- III. Provided that where such a complaint cannot be made in writing, the Presiding Officer or any Member of the Internal Complaint Committee shall render all reasonable assistance to the women for making the complaint in writing.
- IV. If the Aggrieved Individual is unable to make a complaint on account of his/her mental or physical incapacity, a complaint may be filed by:
 - His/her relative or friend; or
 - His/her co-worker; or
 - Any person either psychiatrist, guardian, authority or special educator who has knowledge of the incident, with the written consent of the Aggrieved Individual or under whose care he/she is receiving treatment or care.
- V. If the Aggrieved Individual for any other reason is unable to make a complaint, a complaint may be filed by any person who has knowledge of the incident, with his/ her written consent.

F. Conciliatory Proceedings:

Based on the severity of the situation and on the request of the women, conciliatory proceedings can be initiated and if such a settlement is arrived at, then the same shall be reported to the Managing Director and the copies of the settlement shall be provided to both the parties and no further inquiry shall be initiated.

If the respondent is not complying with terms of settlement which were arrived at, then the ICC shall proceed with inquiry or could forward the complaint to the police.

The copy of the findings and opportunity to be heard shall be made available to both the parties.

G. Manner of Inquiry into Complaint:

- I. Complainant should submit the complaint along with supporting documents and the names of the witnesses.
- II. Upon receipt of the complaint, the committee should send 1 copy of the complaint to respondent within 7 working days.
- III. Respondent shall reply with all supporting documents within 10 working days of receiving the copy of the complaint.
- IV. No legal practitioner can represent any party at any stage of the inquiry procedure.
- V. The Committee shall inquire into the complaint in accordance with the principles of natural justice.
- VI. In conducting the inquiry, a minimum of three committee members including the Presiding Officer should be present.
- VII. All proceedings of the Committee will be recorded in writing. The Committee and individuals shall endorse their respective statements as token of authenticity. In case of refusal to endorse the same by either party the endorsement shall be made by the presiding officer with appropriate remarks.
- VIII. The conciliation process and inquiry will be done simultaneously and will be completed within 90 days. During the inquiry the Complaints Committee may give directions relating to procedure that, in its opinion, will reduce the delay and will help to achieve a prompt hearing of the complaint.
- IX. On completion of an inquiry a report would be submitted by the ICC to the Managing Director within 10 days. The report will contain outline of the case, investigation process, conclusion based on the balance of probabilities, findings based thereof and recommendations.
- X. The ICC shall share a copy of the findings of the inquiry with the aggrieved person and the respondent.
- XI. If any party is not satisfied or further aggrieved by the implementation or non-implementation of the recommendations passed by the committee, either of the party may file an appeal before the appellate authority in accordance with Act and the rules, within 90 days of the recommendations being communicated.
- XII. If the committee arrives at a conclusion that the allegation against the respondent has not been proved, it should recommend to the Managing Director that no action is required to be taken in this matter.

H. Interim Relief to the Aggrieved Woman:

During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the Managing Director to –

- Transfer the complainant or the respondent to any other workplace.
- Grant leave to the aggrieved woman of maximum 3 months, in addition to the leave she would be otherwise entitled.
- Prevent the respondent from assessing complainant's work performance.
- Grant such other relief as may be appropriate.

Once the recommendations of interim relief are implemented, the Managing Director will inform the committee regarding the same.

I. Penalty awarded to the Respondent:

If the committee arrives at a conclusion that the allegation against the respondent has been proved, the committee shall recommend the Managing Director

- i. To take action for sexual harassment as a misconduct as mentioned in the Service Regulations of Can Fin Homes Ltd.
- ii. To deduct from the salary or wages of the respondent such sum it may consider appropriate to be paid to the aggrieved woman or her legal heirs.

J. Action Taken on false or malicious Complaints:

In case the Committee arrives at a conclusion that the allegation against the Respondent is malicious or the Complainant has made the complaint knowing it to be false or has produced any forged or misleading document, it may be recommended to the Company to take suitable action against the Complainant who has made such a frivolous complaint, in accordance with the provisions of the applicable service rules or as prescribed under applicable law.

Mere inability to substantiate a complaint or provide adequate proof need not attract action against the Complainant. Further, the malicious intent on part of the Complainant needs to be established through the inquiry process before any action against such Complainant is recommended by the ICC to the Company.

K. Duties of the Employer:

- i. Provide a safe working environment at the workplace which shall include safety from the persons coming into contact at the workplace.
- ii. Display at any conspicuous place in the workplace' the penal consequences of sexual harassments; and the order constituting the ICC.
- iii. Declare names and contact details of all members of the ICC.
- iv. Organize workshops and awareness programs at regular intervals for sensitizing the employees with the provisions of the 2013 Act and orientation/capacity building programs for the members of the ICC.
- v. Provide necessary facilities to the ICC for dealing with the complaint and conducting an inquiry.
- vi. Assist in securing the attendance of respondent and witnesses before the ICC and make available such information to the ICC in context of the complaint.
- vii. Provide assistance and initiate action to the aggrieved person if they so choose to file a complaint against the respondent in relation to the offence under the IPC or any other law for the time being in force;
- viii. Treat sexual harassment as misconduct under the code of conduct and initiate action for such misconduct;
- ix. Monitor the yearly submission of the annual reports by the ICC to the Managing Director and to the District Officer with regard to the number of cases filed if any, and their disposal under the Act.
- x. Management on the recommendation of the complaints committee and / or the HR department may seek appropriate expert advice and arrange for help and support for the recipient in the form of counseling and / or medical attention

INTERNAL COMPLAINTS COMMITTEE AT CAN FIN HOMES LTD, RO				
Sl.No.	Position	Name	Phone No.	E-Mail Id.
1.	Presiding Officer			
2.	Member			
3.	Member			
4.	External Member			

Human Rights Statement

As one of its core values, CAN FIN HOMES LIMITED ("CFHL") supports, protects and promotes human rights and ensures that fair, ethical business and employment practices are followed.

CFHL is committed to the compliance of all applicable employment, labour and human rights laws. This Statement applies to all stakeholders of CFHL, including employees (whether permanent, contractual or temporary), Directors, business partners, vendors, suppliers, consultants, trainees, direct selling agents, or any other person / entity acting for and on behalf of CFHL.

This Statement sets out the broad framework to ensure that all stakeholders are treated with utmost respect and dignity and conveys the fact that CFHL does not condone human rights violations or abuses.

CFHL is committed to maintain a safe, harmonious business environment and workplace for everyone, irrespective of caste, region, gender, religion, disability, qualifications, background etc. CFHL advocates that the workplace should be free from violence, harassment, intimidation and/ or any other unsafe or disruptive conditions, either due to external or internal threats. Accordingly, CFHL has strived to provide reasonable safeguards for the benefit of employees while having due regard for their privacy and dignity.

CFHL prohibits all forms of slavery, coerced labour, child labour, human trafficking, physical/sexual violence etc.

The protection of CFHL's brand, reputation, trust as an institution which promotes and protect human rights is imperative. Any non-compliance or adherence to the practice of human by any employee or any other stakeholders is likely to invoke appropriate disciplinary /punitive action.

Fair Competition Policy

Laws encouraging fair competition known as competition laws in most countries are made by the governments to restrict activities which prevent competition and create monopolies. Lack of competition results in manipulation and exploitation of markets to the detriment of the economy.

Can Fin is totally committed to doing business by ethical practices for the benefit of consumers, clients, suppliers, regulatory authorities, all other stakeholders and the community at large. Adhering to fair play rules will also enable us to avoid legal liabilities and penalties.

This Policy is applicable to all staff of Can Fin Homes Limited directly and any third party acting on behalf of Can Fin Homes Limited.

As per the principles of the fair and open competition followed by us:

- Concentration will be on achieving advantages through good performances and by avoiding unethical, unlawful practices.
- No discrimination in respect of suppliers, clients or customers
- No discussion, collusion or arrangements with, competitors regarding:
 - Customers, Products, Markets, Locations, Costs, Pricing, Contracts, Bids or quotes,
 - Suppliers, Distributors which may be detrimental to the interest of the Company.
- Not undertake any activities which unfairly restrict competition, upset the free market or likely to abuse a prominent market position
- Ensure efficient market operations by providing competitive prices, product choices, and innovation.

Another company is considered a competitor if it competes with Can Fin Homes Limited in the relevant sales markets (Housing Finance), if it vies for customers, loan proposals, or if it competes with Can Fin Homes Limited for employees in the labour market.

Communications with a competitor can raise suspicions that an anticompetitive agreement has been formed that can subject Can Fin Homes Limited to an investigation or litigation.

Additionally, in some jurisdictions, the exchange of competitively sensitive information is also considered to be a violation of competition laws.

Can Fin Homes will not share confidential business information unrelated to an agreement, and will not restrict or limit competition on other bids.

In all instances where there might be a necessity to discuss or, potentially agree upon matters with a competitor, the employees of Can Fin Homes Limited should seek professional advice from either the inhouse legal department, or if required, outside legal counsel or from the Legal & Regulatory Affairs Department.

The Policy shall be reviewed periodically and modified as and when found necessary.

Stakeholder Engagement Policy

Can Fin Homes Limited (CFHL) recognizes that effective stakeholder engagement is an essential component of our business operations to be undertaken at business and site level. It is an important mechanism to understand stakeholders and their needs, involve them in managing risks and resolving conflicts at an early stage, thus ensuring a long term 'social license to operate' for a business.

CFHL endeavours to achieve this by:

- Maintaining positive legal compliance to applicable stakeholder engagements, disclosure regulations and conforming with the requirements of the Can Fin Homes Sustainability Framework.
- Ascertaining the nature of impact on stakeholders, their legitimate concerns, interests and expectations as well as their potential influence on Can Fin Homes for analysing the implications of those factors on business operations.
- Embedding the principles of inclusiveness, transparency, materiality, completeness and cultural appropriateness in all our engagement activities.
- Seeking to disclose information about the company's activities in a timely and culturally appropriate manner to enable informed and meaningful engagement.
- Resolving stakeholder grievances in a timely and culturally appropriate manner.

Undertaking engagement in a non-discriminatory and interactive manner that encourages stakeholders to provide feedback and engage positively with the business operations.

This policy shall be reviewed periodically for its suitability and updated as necessary.
