



**MUFIN GREEN FINANCE LIMITED**

*Formerly known as APM Finvest Ltd.*

# Conflict of Interest Policy (CoI)

<b>Policy:</b> Conflict of Interest Policy (CoI)	<b>Policy version:</b> V.1
<b>Date of issue:</b> September 01, 2022	<b>Authorized by:</b> Board of Directors
<b>Effective from:</b> September 01, 2022	<b>Adopted by:</b> Board Resolution dated September 01, 2022

CIN : L65990RJ2016PLC054921



011-42610483



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**Registered Office :** SP-147, RIICO Industrial Area, Bhiwadi, Distt. Alwar, Rajasthan-301019



## PURPOSE

This policy is designed to provide guidance to conduct business with professionalism, integrity, honesty, moral and ethical standards. The Conflict of Interest policy is intended to ensure that all associates avoid obligations to or relationships with any person or business with whom Mufin Green Finance Limited (Mufin) competes or does business. Such obligations or relationships could affect judgment in fulfilling their responsibilities to Mufin and give rise to a conflict of interest. The policy guides us to avoid any conflict or appearance of a conflict between our personal interests and our Company's interests. It lays the principles for undertaking business transactions with undivided loyalty and without any personal conflicts.

## GOVERNANCE

Any changes to this policy shall be tracked and documented for future reference and all changes shall be performed only after prior approval of the Compliance Officer. Compliance Officer shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time. Compliance Officer shall monitor the effectiveness and review the implementation of the compliance principles set forth in this policy, regularly considering its suitability, adequacy and effectiveness.

## APPLICABILITY

This policy applies to all Associates (means on-roll employees of all Mufin and related entities of Mufin), Board Members, contractors, consultants, trainees, of our Company and our subsidiaries, affiliates, group companies and persons or entities contractually obligated across the globe.

## POLICY FRAMEWORK

### *Conflict of Interest*

Conflicts of interest may arise where an Associate places his or her personal interests before the interests of Mufin. Such personal interests may exist or appear to exist due to a relationship with an individual(s) or entity(s) which can influence or appear to influence the objectivity or efficiency while undertaking assigned responsibilities.

### *Scenarios*

Indicative scenarios, situations or relationships that may lead to actual, potential or perceived conflict of interest are as follows:

- Engaging in a personal capacity, in any form of paid/unpaid, verbal/contractual relationship, directly or indirectly, with any individual/entity with which the Company has a current or ongoing relationship.
- Conducting business as a representative of the Company, with an entity in which you hold a financial or commercial interest, or are affiliated to. This interest may be held directly in a personal capacity or indirectly via a closely related person.





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- Acting as consultants/advisors in any form to any government/regulatory body/industry association, which can influence the Company's business.

### *Relatives working in the company*

The organisation defines a 'Relative' as someone related closely by blood or marriage, or whose relationship with the associate is similar to that of persons who are related by blood or marriage or any other relationship that would present a conflict of interest as determined by the organisation.

The "Relative" is defined as under Companies Act, 2013 shall be applicable for this policy.

### *Relationships with competitors*

- Associates should not own/ purchase a stake in any competitor Company without prior written consent unless it has been purchased through listed stock.
- Any relative employed with a competitor or any such relationships which may arise during employment should be declared using the mechanism provided.

### *Employment outside the Company:*

- Associates cannot accept any employment or work - remunerative or otherwise, outside the Company which may interfere, restrict or impair your ability to undertake your assigned roles and responsibilities at the Company.
- Academic speaking engagements for limited hours, on a non-remunerative basis, may be accepted if they do not adversely affect your work at Mufin, however prior intimation and approval of such engagements should be sought from the Human Resource department.

For any services or roles irrespective of whether they are remunerative or non-remunerative including association with charitable/not-for-profit/non-commercial organisations or any form of participation, consultancy or support in product development<sup>3</sup>, must be informed to the Human Resource department.

### *Reporting and Complaint Procedure*

- The Company is aware that certain conflicting interests cannot be avoided or are impractical to avoid, such as closely related person employed with a customer.
- This policy is designed to uphold and promote the above framework, Mufin and serves as a mechanism for all associated to report genuine concerns pertaining to unethical behaviour, actual or suspected fraud or violation of Conflict of Interest Compliance Principles without fear of reprisal.
- A potential or actual conflict of interest must be promptly declared to the Compliance Officer. Associates must disclose any potential or existing conflict of interest during their employment with the company or at the time of joining.
- Any of the Company related tasks must be avoided with the conflicted party in the interim. Adequate response shall be communicated within 30 days of submission of the declaration.

## **BREACH OF POLICY**

Any breach of the Policy including failure to report potential violations of compliance principles or applicable law may result in disciplinary measures up to and including termination, suspension of employment or penalty.

## **EXCEPTIONS TO THE POLICY**

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Any exception to the principles mentioned in this policy must be pre-approved by Compliance Officer.

**Specimen form for Declaration of Conflict of Interest**

I understand that it is my obligation to make this declaration of all conflicts and potential conflicts of interests to the Company. I would like to declare an existing or potential conflict of interest situation arising from the discharge of my duties concerning the operation of Mufin. The details are as follows:

Name of party/ individual with whom I may have a direct or indirect potential relationship:

.....

Details of my relationship with the party:

.....

(This may include details of any relationship as per the Policy on Conflict of Interest such as family relationship such a brother, sister etc., including a family member employed in the entity, or a commercial interest such as loans or shareholding or contractual relationship such as employment, etc.)

*Type of Conflict (Tick mark which apply):*

- 1. Relationship with person/entity outside Mufin
- 2. Relationship with a Mufin Associate
- 3. Relationship with a competitor/ individual employed with a competitor
- 4. Employment outside Mufin

**Relationship of the conflicted party with Mufin:**

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(This may include relationships such as vendor, customer, contractor, consultant, or competitor. In case of an on-roll associate within Mufin please provide their designation, function and location)

Any other details, If required:

By signing this declaration, I acknowledge that the information provide by me is true to the best of my knowledge.

