

Brief Write – up on Code of Conduct for Board of Directors and Management Personnel

The Company has adopted a Code of Conduct for its Board of Directors and Management Personnel in compliance with Schedule III of the SEBI (Merchant Banking) Regulations and Section 166 of the Companies act 2013. The Code serves as a guiding framework for ethical conduct, governance, and fiduciary responsibility of directors and senior management.

Applicability

The Code applies to all Executive Directors, Independent/Non-Executive Directors (to the extent permissible), and Management Personnel, including functional heads one level below the Executive Directors.

Key Principles:

- **Accountability & Integrity** – Directors and management must discharge their duties in good faith, exercise independent judgement, and act in the best interest of the Company and stakeholders.
- **Conflict of Interest** – They must avoid situations that create actual or potential conflicts with the Company's interest and disclose any unavoidable conflicts.
- **Compliance**- Full adherence to applicable laws, SEBI regulations, and internal policies is mandated.
- **Confidentiality** – All unpublished price sensitive information, client data, and Company information must be kept confidential and not misused.
- **Investor Focus** – Ensure fairness transparency, and timely disclosures to investors, while upholding high standards of integrity in communication and conduct.
- **Fair Practices** – Directors and management must avoid insider trading, misrepresentation, or unfair competition, and must safeguard Company assets.
- **Corporate Governance** – Promote a culture of ethical decision-making, teamwork, non-discrimination, and accountability across the organization.

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