



S H A N N O N

SHANNON ADVISORS PRIVATE LIMITED

Code of Conduct and Ethics

Effective from April 05, 2024



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1. Introduction

Shannon Advisors Private Limited ('Shannon') places a paramount emphasis on ethical conduct, fairness, and transparency among its employees. These principles are not just ideals but foundational pillars that guide every action and decision made within the organization. Upholding these values is not only a moral imperative but also a business necessity, as they are instrumental in building and maintaining trust with our clients.

Our commitment to integrity is not merely a statement; it is ingrained in the fabric of our corporate culture. Each employee is expected to embody these values in their daily interactions and professional responsibilities, as outlined in the Company's comprehensive Code of Conduct and Ethics ('Code'). This Code serves as a blueprint for ethical behavior, outlining the standards and expectations that every individual, regardless of their role or level within the company, must adhere to without exception.

By adhering to the Code, employees contribute to creating an environment of trust, reliability, and credibility. This, in turn, strengthens our relationships with clients, partners, and stakeholders, reinforcing Shannon's reputation as a trusted and respected advisor in the industry. Our collective commitment to ethics, fairness, and transparency not only reflects our core values but also underscores our dedication to upholding the highest standards of professional conduct across all aspects of our business operations.

2. Responsibility

The role of the Compliance Officer is crucial in upholding standards within an organization. It is the Compliance Officer's duty to ensure that all personnel are well-acquainted with the Company's Code of Conduct and that these guidelines are strictly adhered to across all levels. This includes educating employees on ethical practices, legal requirements, and company policies to mitigate risks and maintain a culture of integrity. Any instance of non-compliance, whether it involves ethical breaches, regulatory violations, or internal policy infractions, must be promptly identified and addressed. The Compliance Officer plays a pivotal role in investigating such incidents, taking corrective actions, and implementing preventive measures to uphold the organization's reputation, trustworthiness, and legal standing.

3. Confidential & Proprietary Information and Data Protection

- a) Confidential & Proprietary Information encompasses a broad range of materials that are crucial to the Company's operations and competitiveness. This includes, but is not limited to, client information such as personal details, contact information, legal, financial and statutory documents and transaction records. It also covers data related to the Company's financial performance, market analysis, and strategic plans. Furthermore, proprietary documents such as contracts, agreements, and internal policies are considered part of this category. Additionally, computer programs, software products, designs, patents, trademarks, inventions, and any other copyrighted materials developed by the Company fall under this umbrella. It also covers information in any form relating to the Company's business strategies, operational methods, personnel, suppliers, customers, and partners. All



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such information and documents are to be treated with the utmost confidentiality and protected according to the Company's policies and legal obligations.

- b) Employees are entrusted with Confidential & Proprietary Information and must handle it responsibly. Unauthorized disclosure or use of such information for personal gain is strictly prohibited. Employees are permitted to share this information only with individuals who have a legitimate need to access it for their job responsibilities, following the principle of 'need to have' and 'need to know'. Additionally, employees must not possess or make unauthorized copies of confidential information without proper authorization.
- c) Employees are required to comply rigorously with the Company's established security measures and internal controls designed to protect information and ensure the integrity and security of computer systems. This includes adhering to the guidelines outlined in the Information Security Policy, which dictates specific procedures and protocols for handling sensitive data and maintaining the confidentiality of proprietary information. By following these security measures, employees contribute to safeguarding the Company's assets and maintaining a secure work environment.

4. Records Management

It is essential for employees to have a clear understanding of their record-keeping responsibilities within the organization. Adhering to proper records management practices and procedures is crucial to maintain the integrity and accuracy of official documents. Employees must refrain from damaging, disposing of, or interfering with official documents of the Company or its clients and customers in any way that could compromise their validity or accessibility.

5. Policy on Countering Bribery

Every employee is strictly prohibited from engaging in the act of offering or receiving any form of bribe or its equivalent, regardless of its nature. This includes but is not limited to monetary incentives, gifts, favors, or other illicit benefits. It is the duty and obligation of each employee to promptly report any such instance to the designated compliance officer. This policy underscores our commitment to ethical conduct and transparency, ensuring that our organization operates with integrity and fairness in all business dealings.

6. Dealing with Clients

Upon receiving any complaint from an Investor, Client, or Government body, it is mandatory for the responsible employee to acknowledge receipt within 5 (five) working days and promptly inform the Compliance Officer and the Principal Officer. The Compliance Officer will then initiate necessary actions to address and resolve the complaint within 15 working days.

In cases where resolving the complaint necessitates more time, a formal communication acknowledging the receipt of the complaint will be sent to the complainant within 5 (five) working days. All responses dispatched to the Investor, Client, and Government bodies will be



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thoroughly reviewed, approved, and/or authorized by either the Compliance Officer or the Principal Officer.

This protocol ensures that all complaints are acknowledged promptly, handled efficiently, and resolved within a reasonable timeframe, fostering trust and transparency in our interactions with.

7. Dealing with Regulatory Authorities

When engaging with regulatory bodies such as SEBI, Stock Exchanges, and Depositories, it is crucial to ensure that communication is conducted through designated personnel within the organization. This responsibility primarily falls upon the Compliance Officer, Principal Officer, and the Directors, who possess the necessary expertise and authority to represent the company effectively.

8. Ill/ Mis-Treatment

If an employee experiences mistreatment within the company, they are encouraged to reach out to the Compliance Officer via email at kirti@shannon.co.in marking cc to legal@shannon.co.in. This includes instances of ill treatment, bias, or favoritism by any employee.

9. Reporting by Employees

Every employee of the Company has the right to report any unethical practice or malpractice they witness or experience involving another employee. This reporting can be done directly to the compliance officer, and employees should feel assured that they can do so without fear of retaliation or repercussions. It's essential for maintaining a healthy work environment and upholding the company's values and standards.

10. Alcohol and Smoking

Any consumption of Alcohol or Smoking is strictly prohibited within the premises of the Company.

11. Attendance & Punctuality

The Company places a high value on punctuality and attendance, expecting all employees to adhere to these standards unless absolutely necessary. Prior approval for any leave must be sought from the responsible team. In the event of an employee being absent without prior approval for a continuous period of four (4) days, an additional day of absence will be incurred.