CONFLICT OF INTEREST & ETHICAL CONDUCT POLICY

WCMS Investment Solutions Pvt. Ltd.

1. Purpose

WCMS IS- is committed to conducting business with integrity, fairness, transparency, and professionalism. This policy establishes standards for identifying, disclosing, and managing conflicts of interest and promoting ethical conduct.

2. Applicability

This policy applies to Directors, Employees, Consultants, Advisors, Referral Partners, Associates, Representatives, and any person acting on behalf of WCMS IS.

3. Guiding Principles

Act honestly and ethically, avoid conflicts of interest, maintain professional independence, and comply with applicable laws and regulations.

4. Conflict of Interest

A conflict may arise when personal, financial, business, or professional interests interfere with objective decision-making.

5. Disclosure Requirements

All actual, potential, or perceived conflicts of interest must be promptly disclosed to management.

6. Gifts, Benefits & Hospitality

No person shall solicit or accept benefits that may improperly influence business decisions.

7. Referral Fees & Business Introductions

Referral and revenue-sharing arrangements shall be documented, transparent, and shall not compromise professional judgment.

8. Fair Treatment of Stakeholders

WCMS IS shall endeavor to treat all stakeholders fairly and without undisclosed preferential treatment.

9. Confidentiality

Confidential information shall be protected and used only for legitimate business purposes.

10. Ethical Business Conduct

WCMS IS shall not engage in fraud, bribery, corruption, misrepresentation, or unethical fundraising practices.

11. Independent Decision-Making

Investment, lending, fundraising, and business decisions remain the responsibility of the respective stakeholders.

12. Reporting Violations

Violations may be reported to management and will be reviewed fairly and confidentially.

13. Consequences of Violation

Violations may result in disciplinary action, suspension, termination, or legal action where appropriate.

14. Commitment to Transparency

WCMS IS is committed to accountability, transparency, and responsible business practices.

15. Policy Review

This policy may be updated periodically to reflect changing business practices and regulatory requirements.

Approval
For WCMS Investment Solutions Pvt. Ltd.

J C THIRUMURUGAN Digitally signed by J C THIRUMURUGAN
Date: 2026.06.09 13:07:09 +05'30'

J. C. Thirumurugan
Director