



CODE OF CONDUCT

Our Integrity guides our conduct towards our existing / potential customers, colleagues, business partners, suppliers, shareholders and the general public. This principle constitutes the foundation of our Code of Conduct as under:

- Compliance with law and the legal system is a fundamental principle for Jubilee Life. Every employee, agent and director (addressed as employee in this document for the sake of simplicity) shall obey the laws and regulations of the legal systems in letter and spirit within which he / she acts. Regardless of the sanctions foreseen by the law, any director, employee or agent guilty of a violation will be liable to disciplinary consequences related to such violation.
- Respect for personal integrity, privacy and personal right of every individual is a fundamental principle. We work together with individuals of various backgrounds, ethnic types, different cultures, genders, religions, ages and disabilities.
- We compete fairly with the quality and the price of our innovative products and services, not by offering improper benefits to others.
- Employees are not permitted to use their jobs to solicit, to demand, accept, obtain or be promised advantages.
- It is Jubilee Life's objective to conduct business with reputable clients and business partners who are involved in lawful business activities. We do not facilitate money laundering.
- It is the duty of Jubilee Life employees to make business decisions in the best interest of Jubilee Life and not based on their personal interest.
- Jubilee Life employees are obligated to protect all assets of the Company, including intangible assets, software products and data within the custody of an individual or group, and use these properly only for the benefit of the Company.
- Open and effective communication requires accurate and truthful reporting. Jubilee Life is required to maintain sound processes and controls so that transactions are executed within approved authorization. Confidentiality is maintained with regard to Jubilee Life's proprietary information that has not been made known to the public. During employment at Jubilee Life, employees may have access to Jubilee Life's confidential, secret and proprietary information. Employees must keep such information confidential during their employment and after leaving the Company until the Company makes the information publicly available.
- Protecting the health and safety of employees in the workplace is a high priority for Jubilee Life. The Company promotes sound environment friendly business

practices. Employees are expected to abide by all policies and procedures introduced by the Company in this respect.

- Willful insubordination or disobedience, theft, fraud, dishonesty in connection with employer's business or property, taking or giving bribes, habitual absence without leaves, habitual late attendance, riotous or disorderly behavior during office hours, negligence of work, striking work or inciting others to strike in contravention of the provisions of any law and going slow fall under misconduct, hence every employee must refrain from these practices.
- Close related employees will not be placed in positions where they will be directly reporting. Any employment of close relatives / acquaintances must be notified in advance to the Human Resources Department. Non-disclosure of such information shall fall under misconduct.
- Conflict of interest may occur if an activity influences or appears to influence the ability of an individual to exercise objectivity or impairs the individual's ability to perform his or her employment responsibilities in the best interests of Jubilee Life. An individual is considered to have a potential conflict of interest if:
 - i) He or she or any family member receives financial or other significant benefit from any external party because of the individual's position at Jubilee Life.
 - ii) The individual or his/her family member has the opportunity to influence Jubilee Life's granting business, investments process, administrative, or other material decisions in a manner that leads to personal gain or advantage to the individual or to the family member.
 - iii) The individual has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's judgement in carrying out their responsibilities to Jubilee Life.
 - iv) A variety of situations, affiliations and relationships may create potential conflicts of interest. An employee's former employment with a prospective, contractor, vendor or supplier could raise an allegation of an apparent or actual conflict of interest, therefore if the former employment relationship is within the last twelve months, employees must disclose the relationship and recuse themselves from managing the grant or contract.
 - v) All positions of influence, financial benefits / interest and other potential conflicts of interest must be disclosed. The employee involved in the conflict situation must work cooperatively with their manager to achieve a resolution of the conflict issues in the best interest of the Company. Depending on the nature of the conflict, this may include the employee being removed from a position of decision-making authority with respect to the conflict situation or other more serious actions.
 - vi) No Director shall hold any direct or indirect ownership interest in an insurance brokerage or take part in the management or direction of an insurance brokerage.
 - vii) No employee shall hold any direct or indirect ownership, management interest or take part in the management or direction of insurance intermediaries including insurance agents, insurance brokerages and insurance surveyors.
- Employees must make appropriate disclosures in case of existing conflict of interest and if at any time the employees' personal situation changes and they feel that they are in a conflict-of-interest situation with the Company. Additionally, every employee has to read and acknowledge this code of conduct in the start of every calendar year.

- Jubilee Life employees should refrain from making public statements of personal opinion regarding Jubilee Life and its Clients, and for all associated stakeholders. Such public statements may include quotes given to the media, contributions to blogs, published articles, social media etc. Any such public statement must be approved by the Functional Head and Head of HR before publication.
- Jubilee Life does not give support to political parties or encourages its employees to express their political opinions or carry out similar discussions within the business premises. Additionally, personal discussion on any religious, lingual and racial matters is strictly prohibited in Jubilee Life.
- All employees are expected to take measures to prevent and discourage any type of Harassment including sex, race, religion, ethnic, minority and disability and report any such instances to their immediate supervisor or through other available channels. A detailed Anti-Harassment Policy is accessible to all employees on HRMS. A printed copy of the Policy may be requested by those who are unable to access HRMS.
- It is the duty of every employee to immediately report suspected activity / incident of fraud, misrepresentation, defalcation or any other activity that is detrimental to the interests of the Company. A Whistle Blowing Policy is accessible to all employees on HRMS. A printed copy of the Policy may be requested by those who are unable to access HRMS.
- Employees are expected to abide by all the policies introduced by the Company. Any violation will be considered as "misconduct".

The employees are expected to abide by the Code of Conduct to keep their integrity intact while dealing with colleagues, existing / potential customers, business partners, suppliers, shareholders and the public at large. The Company will always strive to maintain high standards of Business Anti-corruption and will follow "Zero Tolerance Policy" for any reported incident of violation.