RBL BANK LIMITED

CODE OF ETHICS AND CONDUCT FOR BOARD OF DIRECTORS AND SENIOR MANAGEMENT

[Under Regulation 17(5) of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015]

Version 1

1. INTRODUCTION

It is vital for the financial and reputational health of the Bank that we conduct our business with honesty and integrity and in compliance with all applicable legal and regulatory requirements.

This Code attempts to set forth the guiding principles on which the Bank shall operate and conduct its daily business with its multiple stakeholders; Government and regulatory authorities, media and other counterparties. It recognises that the Bank is a trustee and custodian of public money, and that in order to fulfill its fiduciary obligations and responsibilities; it has to enjoy the trust and confidence of the public at large. This Code also brings together, in one document, the obligations and responsibilities of the Directors and members of the Senior Management.

The Bank shall continue apply policies which are customer-centric and which promote financial prudence. The Bank is committed to continually review and update its policies and procedures. This Code is complementary to all Process Manuals prescribed for conduct of various activities of the Bank. Further guidance on the Banks standards in specific areas is indicated in related corporate policies and guidelines.

2. NEED AND OBJECTIVE OF THE CODE

This Code of Ethics and Conduct (Code) sets out the fundamental standards to be followed by Board Members and Senior Management Officials. The Code envisages and expects the following:

a. Adherence to the highest standards of honest and ethical conduct, including proper and ethical procedures in dealing with actual or apparent conflicts of interest between personal and professional relationships.
b. Full, fair, accurate, timely and meaningful disclosures in the periodic reports required to be filed by the Bank with Government and regulatory authorities.
c. Compliance with applicable laws, rules and regulations.
d. To address misuse or misapplication of the Bank's assets and resources.
e. The highest level of confidentiality and fair dealing within and outside the Bank.

3. APPLICABILITY

This Code is addressed to Board members and to the Senior Management of the Bank. “Senior Management” shall mean personnel who are members of the “MANCOM Team” as well as who are permanent attendees of the meeting of the Board of Directors, all personnel one level below the Managing Director & CEO of the Bank and all personnel in the grade of Senior Vice

President II and above. For senior management, this Code is in additional to the HR Code of Conduct, and they shall observe compliance of both the Code(s).

4. GENERAL STANDARDS OF CONDUCT

Board members and Senior Management officials shall engage in and promote honest and ethical conduct of Bank's business in a professional manner in order to protect Banks public image and reputation. Board members and Senior Management officials must act honestly, while discharging their duties. They are expected to act with the degree of care and prudence which an ordinary person is expected to take in his/her own business. These standards need to be applied while working in the premises of the Bank, at offsite locations where business is being conducted, at Bank-sponsored business and social events, or at any other place where they act as representatives of the Bank.

Board members are required to discharge the duties prescribed under Section 166 of the Companies Act, 2013. Duties of Independent Directors are mentioned in Schedule IV to the Act and Responsibilities & obligations of Directors as mentioned in SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015 are indicated in the **Annexure 1** and **Annexure 2** to this Code, respectively.

5. INSIDER TRADING

As an Insider, you may have access to material, non-public (or "inside") information about our Bank, our clients and companies that conduct business with us, which if made public could have an impact on the price of the traded security issued by the Bank, our clients and companies that conduct business with us, as the case may be. Such information is called "Unpublished Price Sensitive Information (UPSI)". RBL Trading Code and Insider Trading regulations prohibit Insiders from acting upon UPSI, to benefit themselves or others. Information is "material" if there is a substantial likelihood that any investor uses it for personal investments, or it could be expected to affect the price of an issuer's securities and relates to future, speculative or contingent events. Information is considered to be "non-public" unless it has been publicly disclosed by the issuer in the securities market (for example, through a press release or on company website).

Any Insider in receipt of potential UPSI should notify the Company Secretary immediately and may be unable to trade personally in the securities of the companies about which he or she has information. It also applies to transactions for any Bank related account, client account or personal account. Thus, if you have material inside information about a customer or vendor of the Bank, you are responsible for ensuring that any purchase or sale of the customer's or

vendor's securities by you or for any personal account is in compliance with the Insider Trading regulations of the SEBI and of the Bank. A "personal account" is any account in which you have a financial or beneficial interest, or for which you have the power to affect or ability to influence trading or investment decisions, either directly or indirectly. Personal accounts typically include accounts of spouse, children and other members of your household, and accounts over which you have the authority to exercise investment discretion.

Using non-public information to trade in securities, or providing a family member, friend or any other person with a "tip", is illegal and should not be used for personal gain.

Board of Directors and Designated employees as defined in RBL Trading Code may be subject to additional restrictions and policies (including pre-clearance before crossing transaction value of Rs 10 lac in a quarter, minimum holding period of six months, contra trade restrictions, blackout periods i.e. trading window closes three weeks before the Board Meetings and ends after 48 hours from the Board Meeting, legal restrictions and reporting requirements) regarding personal trading of securities. The Bank reserves the right to monitor any account for suspicious activity and accounts are subject to applicable regulatory reporting requirements.

No Insider shall indulge in gambling or speculative activities in any shares, stocks, securities, commodities or valuables. He/she can, however, make bonafide investment of his/her own funds in such securities as he/she may wish to buy.

*(An executive summary of RBL Trading Code and Full RBL Trading Code along with necessary forms are attached as **Annexure 4** and **5**)*

6. CONFLICT OF INTEREST

Board members and Senior Management officials are required to maintain highest level of professional and personal integrity to avoid situations in which an individual's personal interest may conflict or appears to conflict with either the interest of the Bank or its stakeholders.

Board members and Senior Management officials shall disclose to the Board any material transaction or relationship that could reasonably be expected to give rise to such a conflict. Conflict of interest arises when any dealing of the Board members / Senior Management officials with any of the related parties such as vendors / customers / other entities, their relatives and also among themselves may appear to be influenced by virtue of powers / authority vested in them.

Board members and Senior Management officials should avoid any activities that could involve or lead to involvement in any unlawful practice or any harm to the Banks reputation or image.

Some of the examples of situations where conflict of interest may arise are:

a. Accepting outside engagements for personal interest.
b. Engaging in personal investment decisions by conducting trading in shares in personal accounts based on business information.
c. Taking a business decision that may result in personal gain, or benefit to a relative or acquaintance.
d. Competing with the Bank for a business opportunity or diverting opportunities.
e. Accepting money, favours, gifts, meals, entertainment or other benefits (not in ordinary course of business) that may influence business or commercial decisions of the Bank.
f. Using the Banks facilities, employees, funds, property or resources towards personal activities.

If anyone believes that he / she has a conflict of interest, or may be perceived to have such a conflict, he/ she must disclose this to the Managing Director or any other person authorised by the Board in this regard.

7. COMPLIANCE WITH APPLICABLE STATUES

The key personnel must comply with all of the laws, rules and regulations applicable to the Bank from time to time. Key personnel must acquire appropriate knowledge of the legal requirements relating to their duties sufficient to enable them to recognize potential dangers, and should seek advice from the Secretarial department. Violation of applicable laws and regulations may subject the key personnel to criminal or civil liability. Such individual violations may also subject the Bank to civil or criminal liability or the loss of business. The Bank shall devote the necessary resources to establish such procedures as may be reasonably necessary to create a culture of accountability and facilitate compliance with this code.

This Code does not summarize all laws, rules, and regulations applicable to the Bank. However, the key personnel may consult the Secretarial department in case they have any queries.

8. DISCLOSURES

Key personnel shall make utmost efforts to comply with all the applicable Compliance and Accounting Disclosures. Further, they shall also provide true and fair information or data to the public at large in their communications. The Bank’s reports and documents are required to be

filed with or submitted to the Reserve Bank of India, Securities and Exchange Board of India, Stock Exchanges in India, Registrar of Companies and other regulatory agencies and true and fair information must be provided to all such regulatory agencies. The public communications of the Bank shall include full, fair, accurate, timely and understandable disclosure. In order to achieve this goal, the Bank expects the Key personnel to exercise due diligence and care and provide prompt and accurate answers to inquiries related to the Bank's public disclosure requirements. Further, no single individual or entity must be given preference while disclosing any information pertaining to the Bank.

Directors are requested to provide following disclosures:

Sr No	**Disclosures under the Companies Act, 2013**	**Frequency**
1	Disclosure of Interest under Section 184(1) the Companies Act, 2013 (Form MBP 1);	Annual. Before April 15 of each year and as and when any change in the other directorship takes place.
2	Declaration under Section 164(2) of the Companies Act, 2013 (Disqualifications for appointment of Director)	Annual. Before April 15 of each year
3	Declaration of Independence under Section 149(6) of the Companies Act, 2013	Annual. Before April 15 of each year

Sr No	**Disclosure required under RBI requirements**	**Frequency**
1	Declaration under RBI guidelines on fit and proper criteria for directors of Banks	Annual. Before April 15 of each year
2	Deed of Covenants entered into with the Directors	Annual. Before April 15 of each year

Sr No	**Disclosure under the RBL Trading Code**	**Frequency**
1	Form E : Annual Disclosure of shareholding under clause 11.4 of the RBL Trading Code	Annual. Before April 15 of each year
2	Form A1 : Application for pre clearance of trade in RBL Bank's shares	Prior approval, If you intend to buy/sell RBL shares, trading value of which exceeds Rs 10 lac in a quarter.
8	Form A2 and Form C : Disclosure on trade done	Within two working days of

	exceeding Rs 10 lakh in a quarter	above buy/sell transaction

Sr No	Disclosure required under SEBI requirements	Frequency
1	Details of Committees positions	Annual. Before April 15 of each year and whenever there is any change

9. USE OF BANK'S ASSETS AND RESOURCES

Board members and Senior Management officials have a duty to the Bank to advance its legitimate interests while dealing with the Bank's assets and resources. Board members and Senior Management officials are prohibited from;

a. Using corporate property, information or position for personal gain;
b. Soliciting, demanding, accepting or agreeing to accept anything of value from any person while dealing with the Bank's assets and resources;
c. Acting on behalf of the Bank in any transaction in which they or any of their relative(s) have a significant direct or indirect interest.

10. CONFIDENTIALITY AND FAIR DEALING

The Bank's confidential information is a valuable asset. It includes all trade-related information, trade secrets, privileged information, customer information, employee-related information, strategies, administration, research in connection with the Bank, and commercial, legal, scientific, technical data that are either provided to or made available to Board members and Senior Management officials by the Bank either in paper form or electronic media to facilitate their work or that they are able to know; or obtain access by virtue of their position with the Bank. All confidential information must be used for Bank's business purposes only.

This responsibility includes the safeguarding, securing and proper disposal of confidential information in accordance with the Bank's policy on maintaining and managing records. This obligation extends to confidential information of third parties, which the Bank has rightfully received under non-disclosure agreements.

To further the Bank's business, confidential information may have to be disclosed to potential business partners. Such disclosure should be made after considering its potential benefits and risks. Care should be taken to divulge the most sensitive information only after the said potential business partner has signed a confidentiality agreement with the Bank.

Any publication or publicly made statement that might be perceived or construed as attributable to the Bank, made outside the scope of any appropriate authority in the Bank, should include a disclaimer that the publication or statement represents the views of the specific author and not the Bank.

The Bank has many kinds of business relationships, with several companies and individuals. Sometimes, they will volunteer confidential information about their products or business plans to induce the Bank to enter into a business relationship. At other times, the Bank may request that a third party provide confidential information to permit the Bank to evaluate a potential business relationship with that party. Special care must be taken by Board members and members of the Senior Management to ensure that the confidential information is handled in accordance with the agreements with such third parties.

The Bank requires that every Director and member of Senior Management should be fully compliant with the laws, statutes, rules and regulations that have the objective of preventing unlawful gains of any nature whatsoever.

Board members and members of Senior Management shall not accept any offer, payment, promise to pay, or authorisation to pay any money, gift, or anything of value from customers, suppliers, stakeholders, etc. that is perceived as intended, directly or indirectly, to influence any business decision, any act or failure to act, any commission of fraud, or opportunity for the commission of any fraud.

11. GOOD CORPORATE GOVERNANCE PRACTICES

Each member of the Board and every Senior and Management official of the Bank should adhere to the following so as to ensure compliance with good Corporate Governance practices.

Directors

Sr. No	**Do's**	**Don'ts**
1.	Attend Board meetings regularly and participate in the deliberations and discussions effectively.	Non-executive Directors do not intervene in the day to day functioning of the Bank.
2.	Study the Board papers thoroughly and enquire about follow-up reports on definite time schedule.	Do not reveal any information relating to any constituent of the Bank to anyone.

3.	Involve actively in the matter of formulation of general policies.	Do not display the logo / distinctive design of the Bank on their personal visiting cards / letter.
4.	Be familiar with the broad objectives of the Bank and the policies laid down by the Government and the various laws and legislations.	Do not sponsor any proposal relating to loans, investments, buildings or sites for Bank's premises, enlistment or empanelment of contractors, architects, auditors, doctors, lawyers and other professionals.
5.	Ensure confidentiality of the Bank's agenda papers, notes and Minutes.	Do not do anything, which will interfere with and / or be subversive of maintenance of discipline, good conduct and integrity of the staff.

Senior Management

Sr. No	**Do's**	**Don'ts**
1.	Involve actively in the matter of formulation of general policies.	Do not reveal any information relating to any constituent of the Bank to anyone.
2.	Be familiar with the broad objectives of the Bank and the policies laid down by the Government and the various laws and legislations.	Do not do anything, which will interfere with and / or be subversive of maintenance of discipline, good conduct and integrity of the staff.
3.	Ensure confidentiality of the Bank's agenda papers, notes and Minutes.	

12. VARIATION OF THE CODE AND WAIVERS

Any variation in the Code or any waivers from the provisions of the Code shall be approved by the Board and shall be disclosed through appropriate channels.

13. ANNUAL DECLARATION

As required under Regulation 17(5) of SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015, all Board members and Senior Management personnel shall affirm compliance with this Code on an annual basis to the Company Secretary or any other person authorised by the Board in this regard. Format of Annual confirmation attached as **Annexure 3**.

14. VIOLATION OF THE CODE

It is one of the important responsibilities of the key personnel to help enforce this Code in the best interest of the Bank. Key personnel should bring to the notice of the HR department any observed violation of this Code or any other policies of the Bank or other rules or regulations governing the Bank or any probability of occurrence of such violations.

Open communication of issues and concerns by the key personnel without fear of retribution or retaliation is vital to the successful implementation of this Code. Key personnel shall cooperate in any internal or external investigations relating to such violations.

The Bank will take appropriate action against any key personnel whose actions are found to violate the Code or any other policy or rules or regulations of the Bank. Disciplinary actions may include immediate termination of employment at the Bank's sole discretion.

ANNEXURES TO THE CODE

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ANNEXURE – 1

Duties of Board of Directors under Schedule IV of Companies Act, 2016

I. Guidelines of professional conduct:

An independent director shall:

1) uphold ethical standards of integrity and probity;
2) act objectively and constructively while exercising his duties;
3) exercise his responsibilities in a bona fide manner in the interest of the company;
4) devote sufficient time and attention to his professional obligations for informed and balanced decision making;
5) not allow any extraneous considerations that will vitiate his exercise of objective independent judgment in the paramount interest of the company as a whole, while concurring in or dissenting from the collective judgment of the Board in its decision making;
6) not abuse his position to the detriment of the company or its shareholders or for the purpose of gaining direct or indirect personal advantage or advantage for any associated person;
7) refrain from any action that would lead to loss of his independence;
8) Where circumstances arise which make an independent director lose his independence, the independent director must immediately inform the Board accordingly;
9) assist the company in implementing the best corporate governance practices.

II. Role and functions:

The independent directors shall:

1) help in bringing an independent judgment to bear on the Board's deliberations especially on issues of strategy, performance, risk management, resources, key appointments and standards of conduct;
2) bring an objective view in the evaluation of the performance of board and management;
3) scrutinise the performance of management in meeting agreed goals and objectives and monitor the reporting of performance;
4) satisfy themselves on the integrity of financial information and that financial controls and the systems of risk management are robust and defensible;

5) safeguard the interests of all stakeholders, particularly the minority shareholders;
6) balance the conflicting interest of the stakeholders;
7) determine appropriate levels of remuneration of executive directors, key managerial personnel and senior management and have a prime role in appointing and where necessary recommend removal of executive directors, key managerial personnel and senior management;
8) moderate and arbitrate in the interest of the company as a whole, in situations of conflict between management and shareholder's interest.

III. Duties:

The independent directors shall:

1) undertake appropriate induction and regularly update and refresh their skills, knowledge and familiarity with the company;
2) seek appropriate clarification or amplification of information and, where necessary, take and follow appropriate professional advice and opinion of outside experts at the expense of the company;
3) strive to attend all meetings of the Board of Directors and of the Board committees of which he is a member;
4) participate constructively and actively in the committees of the Board in which they are chairpersons or members;
5) strive to attend the general meetings of the company;
6) where they have concerns about the running of the company or a proposed action, ensure that these are addressed by the Board and, to the extent that they are not resolved, insist that their concerns are recorded in the minutes of the Board meeting;
7) keep themselves well informed about the company and the external environment in which it operates;
8) not to unfairly obstruct the functioning of an otherwise proper Board or committee of the Board;
9) pay sufficient attention and ensure that adequate deliberations are held before approving related party transactions and assure themselves that the same are in the interest of the company;
10) ascertain and ensure that the company has an adequate and functional vigil mechanism and to ensure that the interests of a person who uses such mechanism are not prejudicially affected on account of such use;
11) report concerns about unethical behaviour, actual or suspected fraud or violation of the company's code of conduct or ethics policy;

12) acting within his authority, assist in protecting the legitimate interests of the company, shareholders and its employees;
13) not disclose confidential information, including commercial secrets, technologies, advertising and sales promotion plans, unpublished price sensitive information, unless such disclosure is expressly approved by the Board or required by law.

ANNEXURE – 2

Responsibilities and Obligations of Directors under SEBI (Listing obligations and Disclosure Requirements) Regulations, 2015

Regulation 4 : Responsibilities of the board of directors:

The board of directors of the listed entity shall have the following responsibilities:

(i) Disclosure of information:

(1) Members of board of directors and key managerial personnel shall disclose to the board of directors whether they, directly, indirectly, or on behalf of third parties, have a material interest in any transaction or matter directly affecting the listed entity.
(2) The board of directors and senior management shall conduct themselves so as to meet the expectations of operational transparency to stakeholders while at the same time maintaining confidentiality of information in order to foster a culture of good decision-making.

(ii) Key functions of the board of directors-

(1) Reviewing and guiding corporate strategy, major plans of action, risk policy, annual budgets and business plans, setting performance objectives, monitoring implementation and corporate performance, and overseeing major capital expenditures, acquisitions and divestments.
(2) Monitoring the effectiveness of the listed entity‘s governance practices and making changes as needed.
(3) Selecting, compensating, monitoring and, when necessary, replacing key managerial personnel and overseeing succession planning.
(4) Aligning key managerial personnel and remuneration of board of directors with the longer term interests of the listed entity and its shareholders.
(5) Ensuring a transparent nomination process to the board of directors with the diversity of thought, experience, knowledge, perspective and gender in the board of directors.
(6) Monitoring and managing potential conflicts of interest of management, members of the board of directors and shareholders, including misuse of corporate assets and abuse in related party transactions.
(7) Ensuring the integrity of the listed entity‘s accounting and financial reporting systems, including the independent audit, and that appropriate systems of control are in place, in particular, systems for risk management, financial and operational control, and compliance with the law and relevant standards.
(8) Overseeing the process of disclosure and communications.
(9) Monitoring and reviewing board of director‘s evaluation framework.

(iii) Other responsibilities:

(1) The board of directors shall provide strategic guidance to the listed entity, ensure effective monitoring of the management and shall be accountable to the listed entity and the shareholders.

(2) The board of directors shall set a corporate culture and the values by which executives throughout a group shall behave.
(3) Members of the board of directors shall act on a fully informed basis, in good faith, with due diligence and care, and in the best interest of the listed entity and the shareholders.
(4) The board of directors shall encourage continuing directors training to ensure that the members of board of directors are kept up to date.
(5) Where decisions of the board of directors may affect different shareholder groups differently, the board of directors shall treat all shareholders fairly.
(6) The board of directors shall maintain high ethical standards and shall take into account the interests of stakeholders.
(7) The board of directors shall exercise objective independent judgement on corporate affairs.
(8) The board of directors shall consider assigning a sufficient number of non-executive members of the board of directors capable of exercising independent judgement to tasks where there is a potential for conflict of interest.
(9) The board of directors shall ensure that, while rightly encouraging positive thinking, these do not result in over-optimism that either leads to significant risks not being recognised or exposes the listed entity to excessive risk.
(10) The board of directors shall have ability to ‗step back' to assist executive management by challenging the assumptions underlying: strategy, strategic initiatives (such as acquisitions), risk appetite, exposures and the key areas of the listed entity's focus.
(11) When committees of the board of directors are established, their mandate, composition and working procedures shall be well defined and disclosed by the board of directors.
(12) Members of the board of directors shall be able to commit themselves effectively to their responsibilities.
(13) In order to fulfil their responsibilities, members of the board of directors shall have access to accurate, relevant and timely information.
(14) The board of directors and senior management shall facilitate the independent directors to perform their role effectively as a member of the board of directors and also a member of a committee of board of director

Regulation 25 : Obligations with respect to independent directors.

1) A person shall not serve as an independent director in more than seven listed entities:

   Provided that any person who is serving as a whole time director in any listed entity shall serve as an independent director in not more than three listed entities.

2) The maximum tenure of independent directors shall be in accordance with the Companies Act, 2013 and rules made thereunder, in this regard, from time to time.

3) The independent directors of the listed entity shall hold at least one meeting in a year, without the presence of non-independent directors and members of the management and all the independent directors shall strive to be present at such meeting.

4) The independent directors in the meeting referred in sub-regulation (3) shall, interalia-
   (a) review the performance of non-independent directors and the board of directors as a whole;

(b) review the performance of the chairperson of the listed entity, taking into account the views of executive directors and non-executive directors;
(c) assess the quality, quantity and timeliness of flow of information between the management of the listed entity and the board of directors that is necessary for the board of directors to effectively and reasonably perform their duties.

5) An independent director shall be held liable, only in respect of such acts of omission or commission by the listed entity which had occurred with his knowledge, attributable through processes of board of directors, and with his consent or connivance or where he had not acted diligently with respect to the provisions contained in these regulations.

6) An independent director who resigns or is removed from the board of directors of the listed entity shall be replaced by a new independent director by listed entity at the earliest but not later than the immediate next meeting of the board of directors or three months from the date of such vacancy, whichever is later:

   Provided that where the listed entity fulfils the requirement of independent directors in its board of directors without filling the vacancy created by such resignation or removal, the requirement of replacement by a new independent director shall not apply.

7) The listed entity shall familiarise the independent directors through various programmes about the listed entity, including the following:
   (a) nature of the industry in which the listed entity operates;
   (b) business model of the listed entity;
   (c) roles, rights, responsibilities of independent directors; and
   (d) any other relevant information.

Regulation 26 : Obligations with respect to directors and senior management.

1) A director shall not be a member in more than ten committees or act as chairperson of more than five committees across all listed entities in which he is a director which shall be determined as follows:
   (a) the limit of the committees on which a director may serve in all public limited companies, whether listed or not, shall be included and all other companies including private limited companies, foreign companies and companies under Section 8 of the Companies Act, 2013 shall be excluded;
   (b) for the purpose of determination of limit, chairpersonship and membership of the audit committee and the Stakeholders' Relationship Committee alone shall be considered.

2) Every director shall inform the listed entity about the committee positions he or she occupies in other listed entities and notify changes as and when they take place.

3) All members of the board of directors and senior management personnel shall affirm compliance with the code of conduct of board of directors and senior management on an annual basis.

4) Non-executive directors shall disclose their shareholding, held either by them or on a beneficial basis for any other persons in the listed entity in which they are proposed to be appointed as directors, in the notice to the general meeting called for appointment of such director

5) Senior management shall make disclosures to the board of directors relating to all material, financial and commercial transactions, where they have personal interest that may have a potential conflict with the interest of the listed entity at large.

   Explanation.- For the purpose of this sub-regulation, conflict of interest relates to dealing in the shares of listed entity, commercial dealings with bodies, which have shareholding of management and their relatives etc.

Annexure - 3

CODE OF ETHICS AND CONDUCT FOR BOARD OF DIRECTORS AND SENIOR MANAGEMENT

I, _____, have read and understood the Bank's Code of Ethics and Conduct (the "Code") for Board of Directors and the Senior Management and do hereby affirm that I have complied with the provisions of the Code during the financial year ended March 31, _____.

Signature

Date :
Place :