Corporate Governance Policy

1. Introduction

Barota Finance Limited, through its digital lending platform **Paisa24Finance**, is committed to maintaining high standards of corporate governance, transparency, accountability, integrity and responsible business practices.

The Company believes that sound corporate governance is essential for maintaining the trust of customers, employees, regulators, shareholders, business partners and other stakeholders.

This Corporate Governance Policy sets out the broad principles and practices that guide the Company's management and operations.

2. Objectives

- Promote transparency and accountability in business operations.
- Maintain high standards of ethical and professional conduct.
- Ensure compliance with applicable laws and regulatory requirements.
- Protect the interests of customers and other stakeholders.
- Establish effective risk management and internal control mechanisms.
- Promote responsible and sustainable business practices.
- Ensure appropriate oversight and accountability in decision-making.
- Identify and appropriately manage conflicts of interest.

3. Governance Framework

The Company's governance framework is designed to provide appropriate oversight of its business operations, financial activities, risk management, regulatory compliance and customer protection.

The Board of Directors provides overall direction and oversight, while the management team is responsible for implementing approved strategies, policies and procedures and managing day-to-day operations.

The Company maintains appropriate reporting and escalation mechanisms to ensure that material business, financial, operational, compliance and risk-related matters receive timely attention.

4. Ethical Business Conduct

The Company is committed to conducting its business with honesty, integrity and fairness.

Directors, officers, employees and representatives of the Company are expected to act honestly and professionally; comply with applicable laws and regulations; protect confidential and customer information; avoid activities that may create conflicts of interest; maintain accurate and reliable records; protect Company assets and resources; and report suspected misconduct or violations through appropriate channels.

The Company does not support fraudulent, corrupt, misleading or unethical business practices.

5. Transparency and Accountability

The Company seeks to maintain transparency in its business operations and communications.

Information provided to customers and other stakeholders should be accurate, clear and consistent with applicable regulatory requirements.

Responsibilities and authorities are appropriately defined within the organisation to promote accountability and effective decision-making.

6. Risk Management

Effective risk management is an important component of the Company's governance framework.

The Company maintains processes for identifying, assessing, monitoring and managing risks that may affect its business and customers.

Depending on the nature of the Company's operations, these risks may include credit risk, operational risk, compliance and regulatory risk, fraud risk, information and cybersecurity risk, data and privacy risk, financial risk, legal risk and reputational risk.

Risk-management practices are reviewed periodically and updated where necessary.

7. Internal Controls

The Company maintains appropriate internal controls and processes designed to safeguard Company and customer assets, maintain reliable financial and operational records, reduce the risk of fraud and errors, support regulatory compliance, promote operational efficiency, and identify and address control weaknesses.

Internal controls are reviewed periodically and appropriate corrective measures are taken where required.

8. Regulatory Compliance

The Company is committed to complying with applicable laws, rules, regulations and regulatory directions relevant to its business.

As an RBI-registered NBFC, Barota Finance Limited seeks to conduct its lending and financial activities in accordance with applicable Reserve Bank of India requirements and other applicable legal and regulatory obligations.

The Company periodically reviews its policies and processes to maintain alignment with applicable regulatory requirements.

9. Customer Protection

Customer protection is an important part of the Company's governance framework.

The Company is committed to providing clear information about its products and services; maintaining transparency regarding applicable fees, charges and loan terms; following responsible lending practices; protecting customer information; maintaining an appropriate grievance redressal mechanism; treating customers fairly and respectfully; and following applicable regulatory requirements relating to customer communications and recovery practices.

10. Conflict of Interest

The Company expects its directors, officers and employees to act in the best interests of the Company and its customers.

Actual, potential or perceived conflicts of interest should be disclosed and appropriately managed in accordance with applicable laws and internal policies.

No individual should use their position within the Company for improper personal benefit.

11. Prevention of Fraud and Corruption

The Company maintains a zero-tolerance approach towards fraud, bribery, corruption and financial misconduct.

Appropriate controls and monitoring mechanisms may be implemented to identify and prevent fraudulent or unethical activities.

Any suspected fraud, corruption or serious misconduct should be reported through the appropriate internal reporting mechanism.

12. Whistle Blower Mechanism

The Company encourages employees and other eligible stakeholders to raise genuine concerns regarding fraud, unethical conduct, regulatory violations or serious misconduct.

Such concerns may be reported through the Company's designated whistle blower or vigil mechanism.

The Company seeks to protect individuals who make genuine reports from retaliation or victimisation, subject to applicable laws and internal policies.

The Whistle Blower Policy is maintained separately and forms part of the Company's overall governance framework.

13. Data Privacy and Information Security

The Company recognises the importance of protecting customer and stakeholder information.

Appropriate security measures and controls are maintained to protect information from unauthorised access, misuse, disclosure, alteration or loss.

Customer information is handled in accordance with applicable data protection and privacy requirements and the Company's Privacy Policy.

14. Audit and Monitoring

The Company maintains appropriate audit and monitoring processes to evaluate the effectiveness of its financial, operational, compliance and internal control systems.

Where deficiencies or areas for improvement are identified, appropriate corrective and preventive actions may be implemented.

15. Stakeholder Engagement

The Company recognises the importance of maintaining transparent and professional relationships with its stakeholders, including customers, employees, regulators, shareholders, business partners, service providers, auditors and other relevant stakeholders.

The Company seeks to address legitimate stakeholder concerns fairly and in a timely manner.

16. Policy Review

This Corporate Governance Policy shall be reviewed periodically or whenever there are significant changes in applicable laws, regulations, regulatory directions, business operations or the Company's governance framework.

The Company may modify, update or replace this Policy where necessary.

17. Compliance with Applicable Law

In the event of any conflict between this Policy and any applicable law, regulation or regulatory direction, the applicable law, regulation or regulatory direction shall prevail.

18. Contact Information

For any queries relating to this Corporate Governance Policy, customers and other stakeholders may contact:

Barota Finance Limited
Through Paisa24Finance

Email: care@paisa24finance.com
Website: Paisa24Finance.com
Contact No.: +91 98881 33360

RBI Registration No.: B-06.00606

This Corporate Governance Policy is subject to applicable laws, regulations and regulatory directions and may be updated from time to time.