

La Prudence Leasing Finance Co. Ltd

***Code of Ethics***

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DOCUMENT DISTRIBUTION *	
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\* Document Distribution refers to the personnel to whom the Code of Ethics is distributed to.

Note: The term “You” used in this Code applies to all individuals to whom the Code applies.

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## 1. INTRODUCTION

This Code of Ethics (the “Code”) sets out the standards and guiding principles of conduct implemented at La Prudence Leasing Finance Co Ltd (“LPLF” or the “Company”) for its employees and other stakeholders in the discharge of their respective duties.

This Code goes beyond what is legally permissible and outlines core principles that should guide business conduct. It establishes standards for behaviour and provides guidance as to ethical dilemmas and/or conflict of interest we may face at work.

The Managing Director and the Head of Compliance & MLRO will oversee adherence to the Code and submit a yearly report to the Corporate Governance and Remuneration Committee.

This Code applies to all LPLF Persons, defined as being any natural or legal person providing services to the Company with either an employment agreement or any other service agreement in place whereby the natural or legal person is/can be brought to act for/on behalf of the Company thereby acting, by extension as its representative.

The Code does not limit or replace any legal, contractual duties, obligations, or standards arising from applicable laws, contractual arrangements or the general employment relationship.

In the application of the Code and other obligations, LPLF is entitled to have higher expectations on staff members that occupy senior positions and leadership roles.

### 1.1 THE FRAMEWORK

LPLF is committed to conducting its business in a fair, impartial and ethical manner.

In carrying out its business operations, LPLF shall ensure that integrity underpins all activities and relationships including those with customers, suppliers, communities, and among employees.

In performing their responsibilities, LPLF Persons must adhere to the highest standards of ethical business conduct and regulatory compliance and must not engage in conduct or activity that may raise questions as to the Company's honesty, impartiality, reputation, or otherwise cause prejudice to the Company.

LPLF Persons are expected to consider the following questions before making a decision involving ethics considerations.

- Is it legal or in line with the letter and spirit of the law?
- Does it comply with this Code, LPLF values and policies?
- Will it affect LPLF's stakeholders? How?
- How will it be perceived by others?
- How would you or the stakeholders feel if this decision was made public?
- Should they ask for advice?

## 1.2 CORE VALUES

LPLF shall, at all times and in all its dealings, act with integrity and in accordance with the highest standards of ethical and professional conduct, thereby avoiding any malpractice that may jeopardise its reputation vis-à-vis its customers and its Regulators.

The core values of LPLF are:

### *Integrity*

Integrity implies honesty, fairness, ethics and moral character.

Honesty is the fundamental standard of conduct expected from all LPLF Persons in every aspect of their dealings. This constitutes the very essence of the services LPLF provides to its customers.

***“ Integrity is doing the right thing, even when no one is watching”***

***– C.S. Lewis***

### *Teamwork*

We endeavour to create the right environment to develop and enhance individual skills and competencies to achieve a common goal. Staff members are expected to foster a sense of unity, belonging and commitment and to contribute to the optimal utilisation of organisational resources.

Employees are encouraged to take initiatives and to participate as a team by offering mutual support and guidance on agreed actions.

### *Innovation*

We proactively seek all opportunities to develop and deliver new and improved products and services in a timely manner and encourage value-adding and innovative ideas that will maintain and enhance the Company's competitive edge.

## 2. CODE OF ETHICS

### *2.1 CONFLICT OF INTERESTS (Please also refer to the Conflict of Interest Manual)*

To determine whether a conflict of interest may arise, you are required to consider the following circumstances:

- Are you likely to make a financial gain or avoid a financial loss at the expense of LPLF and the stakeholders;
- Do you have an interest in a transaction carried out on behalf of a client which is distinct from that of LPLF and its Stakeholders' interest;
- Do you have a financial or other incentive to favour the interests of one client or group of clients over the interests of LPLF;
- Do you carry out the same business as LPLF;
- Do you receive or will you receive from a firm or individual other than LPLF any inducement in relation to a service provided to the client, in the form of monies, goods or services, other than the standard commission or fee for that service.

## 2.2 FINANCIAL AND OTHER INTEREST

- You must not have any interest, financial or otherwise, direct or indirect, or engage in any business, transaction or professional activity, which is in conflict with the proper discharge of your duties at LPLF.
- You will not use the name of LPLF, its brand or your position in the Company to further private interests be it monetary or non-monetary for yourselves or anyone you know.
- You will not use the name of LPLF, or your position at LPLF, to obtain goods, services, or preferential treatment for yourselves or anyone else.
- You will pay attention to any situation where your private interest could possibly conflict with your duty as an employee of LPLF.
- You will ensure that your dealings with the colleagues and external parties do not place you in a position of obligation that may lead to a conflict of interest.
- You will not hold financial interest in any business venture that competes with or is engaged in the same line(s) of business(es) as that within which LPLF operates where such interest could represent either an actual or a potential conflict of interest.

“Financial Interest” means any position including but not limited to being an owner, proprietor, manager, partner, senior officer, director, substantial shareholder or beneficiary.

- You will not derive or cause another person to derive personal benefit from confidential or “insider information” that you obtained in the course of your employment.
- If your position allows you to conclude business deals or allocate supply of goods or services on behalf of LPLF, you will not knowingly engage the Company in any deal which represents an actual or potential conflict of interest except if such conflict of interest has been previously disclosed to Management.

## 2.3 OUTSIDE EMPLOYMENT AND ACTIVITIES

- Your activities outside LPLF should not impact the Company's reputation or interfere with your duties.
- You may not accept payment for activities that in any way draw on your role as an official of LPLF.
- You may not engage (even without remuneration) in outside employment, business interests or other activities, which could interfere with your LPLF duties, except where express written approval has been sought and granted by Management.

#### *2.4 POST EMPLOYMENT ACTIVITIES*

Upon the termination of the employment contract, the employees are required to return any and all Company property, including but not limited to laptops, computers, USBs, documents, files, IT data, equipment, reports and records containing any LPLF or non-public information, as well as all copies of such information whether in hard copy or soft copy formats.

#### *2.5 FAMILY MEMBERS*

Staff members must not grant any special favours to friends, relatives or any associates. Your position as a staff member of LPLF must never be misused at any time and no favour or reward of any kind should be offered or accepted for the rendering of your services.

#### *2.6 SALES AND MARKETING ACTIVITIES*

Sales personnel are often the first point of contact with our customers, making it essential that they consistently make decisions guided by ethical principles at all times and follow the below practices:

- Acting according to high standards of honesty, skill, care and conscientiousness.
- Putting the interest of LPLF above your interest.
- Operating strictly within the terms and conditions upon which they were appointed taking into account that LPLF is liable for their actions.
- Providing the customer with all relevant information about the product so as to allow him/her to make an informed decision.

### **3. INFORMATION PRIVACY AND CONFIDENTIALITY**

All LPLF Persons are required to uphold the highest standards of confidentiality in respect of any information acquired in the course of their duties, both during their employment or duration of their relevant agreements with the Company and after their contractual obligations with LPLF has ended.

LPLF Persons must not use confidential and sensitive information (information not available to the public) to further their personal interests (financial or non-financial) or to benefit others. It is important that marketing and commercially sensitive and proprietary information be kept confidential. In that respect, the following should be adhered to:

- i) Every LPLF Person shall maintain during or after their relationship with the Company, the confidentiality of any matter which may have come to their knowledge by virtue of their contractual obligation towards the Company.
- ii) LPLF Persons shall ensure that information in any form is not released to any unauthorized parties except where written approval has been granted by the Company.

## 4. BUSINESS CONDUCT

### 4.1 EMPLOYMENT PRACTICES

#### *Exercise of Authority*

You will treat your colleagues with respect and seek when necessary, the professional opinions of colleagues in their areas of competence and acknowledge their contribution.

#### *Professionalism*

You will endeavour to achieve outstanding performance through continuous development and by diligently following established policies and procedures.

You will comply with all rules and regulations of LPLF as well as orders or instructions issued from time to time by Management. You may hold views on particular matters that differ from those of LPLF, but such views must not interfere with the reasonable level of professionalism expected from the Company's employees.

#### *Harassment*

Abusive, harassing or offensive conduct is unacceptable, whether verbal, non-verbal, psychological, physical or visual. Examples include but are not limited to derogatory comments based on racial or ethnic characteristics, verbal abuse, swearing, insult, bullying, threatening behavior, aggressive gestures, intimidation, contempt and unwelcome sexual advances.

#### *Use of Company's Assets*

The use of LPLF assets, equipment, facilities or services is strictly for the conduct of the Company's business. Non-LPLF personnel must not be permitted to use LPLF resources or utilities unless same has been permitted by the Management, with due rationale given and documented.

You are responsible for safeguarding Company assets entrusted to you against loss, damage, misuse, or theft. You are expected to handle such Company assets with a reasonable level of care.

#### *Health and Safety*

Staff members are expected to comply with all applicable health and safety requirements and to promptly or bring to the attention of Management any situation that poses, or could pose a health or safety hazard.

In that respect, LPLF commits to working free from the influence of any substance or such factors that could compromise LPLF and its employees' ability to work safely and effectively.

#### *4.2 PUBLIC INFORMATION AND COMMUNICATION*

Staff members must not disclose any information acquired in the course of their duty to the press or give any statement or interview to the press without formal authorisation from Management or designated personnel with delegated authority.

#### *4.3 DOING BUSINESS WITH OTHERS*

Staff members must avoid engaging in business relationships with individuals or organizations where such business relationships can potentially cause harm to the good reputation of LPLF. For example, you should not conduct business with other companies that intentionally and continually violate the law. All arrangements with third parties must comply with both LPLF's internal policy and the law.

#### *4.4 INSIDER INFORMATION AND SECURITIES TRADING*

Staff members must not trade in Financial Assets, Securities, Goods, Services and Commodities based on knowledge they have gained solely by virtue of their position at LPLF, if that information has not been reported publicly. It is against LPLF's principle to trade or to "tip" others who might make an investment decision based on information available only internally to LPLF or LPLF Persons.

#### *4.5 RECORDING AND RETAINING BUSINESS COMMUNICATIONS*

All business records and communications should be clear, truthful and accurate. Staff members should avoid exaggeration, guesswork, legal conclusions and derogatory remarks or characterizations about individuals or organizations.

#### *4.6 ANTI-CORRUPTION LAW*

Staff members must strictly comply with all applicable anti-corruption laws, regulations, guidelines and guidance that may be issued by the relevant authorities of the Republic of Mauritius, the local legislation being in force concerning Anti bribery and corruption being the Financial Crimes Commission Act 2023 ("FCCA").

#### *4.7 GIFTS, HOSPITALITY AND PROMOTIONAL EXPENDITURE POLICY*

LPLF Persons, in their performance of their duties, should not use their positions for personal gain whether for themselves, their families or any other person. All Gifts, Hospitality and Promotional Expenditure ("GHPE") in excess of a designated value of Rs 5,000 must be approved by the Managing Director and/or Chairman of the Board of Directors prior to acceptance and shall be recorded in a GHPE Register. LPLF Persons must not accept any gift or such treatment that might appear to compromise their judgment or decisions in the performance of their duties.

The risk associated with GHPE relates to bribery and corruption.

GHPE used during the Company's course of doing business may be seen or understood as a bribe. Therefore, GHPEs should be reasonable, proportionate and made in good faith.

The following criteria may be helpful to assist LPLF Persons to ensure that any Gifts, Hospitality and Promotional Expenditures are not bribes:

- (i) Made for the right reason
  - *if a gift or hospitality, it should be given clearly as an act of appreciation, if promotional expenditure, then for a bona fide business purpose.*
- (ii) No attached obligation or expectation of any favour in return
  - *the gift, hospitality or promotional expenditure does not place the recipient under any obligation.*
- (iii) Made openly
  - *if made secretly and undocumented then the purpose of the gift or hospitality or promotional expenditure will be open to question.*
- (iv) Documented
  - *the expense is fully documented including the purpose and approvals given and properly recorded in the books.*
- (v) Reported
  - *the gift, hospitality or promotional expenditure is recorded in a gift register and reported to Management.*
- (vi) Accords with stakeholder's perception
  - *the transaction would not be viewed unfavourably by stakeholders if it were to be made known to them.*
- (vii) Reasonable value
  - *the size of the gift, hospitality or promotional expenditure is relative to the context in which the Company operates.*
- (viii) Conforms to the recipient's rules
  - *The Legal Person should ensure that it has proper processes in place to ensure that any gift, hospitality or promotional expenditure is received by the person who is entitled to any such gift.*
- (ix) Infrequent
  - *the giving or receiving of gifts or hospitality or promotional expenditure is not overly frequent between the giver and the recipient.*

## 5. NOTIFICATION PROCEDURES

LPLF Persons must stay alert to such scenarios where acts and/or omissions by themselves or others could be in violation of this Code. Any breach of this Code should be brought to the attention of Senior Management or can be raised as a 'Reportable Event' under the Company's Whistleblowing Policy, available on the company website.

LPLF Persons have the obligation, if they are uncertain about any section of this Code, to consult at least one of the following:

- The Managing Director;
- The Head of Compliance & MLRO; or
- The Company Secretary.