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RESPONSIBLE
SERVICE PROVIDER
CODE OF CONDUCT

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1. INTRODUCTION

The True North Responsible Service Provider Code of Conduct (the “**Code**”) is one of the ways we put True North’s (the “**Firm’s**”) values into practice. Our values define who we are and govern everything we do. We expect all our Service Providers who work with the Firm to read and abide by this Code in all their dealings with the Firm and otherwise in their business.

This Code shall be applicable to any person or entity that performs services for or on behalf of the Firm. This includes third parties like accounting firms, consultants, lawyers, investment bankers, bankers, and contractual vendors who engage with the Firm (“**Service Providers**”).

All Service Providers must share our commitment to integrity by following the principles of this Code when providing goods or services to the Firm or acting on our behalf.





2. RESPECTING PEOPLE

Service Providers should be committed to fostering a supportive work environment that prohibits discrimination or harassment on the basis of religion, race, ethnicity, caste, colour, sexual orientation, gender expression or identity, age, medical condition, pregnancy status, marital status, mental or physical disability, or any other characteristics.

Service Providers should not use or condone child or forced labour in any of their operations or premises and work to ensure these practices are not present in their workforce.



3. ANTI-BRIBERY

The Firm will never use Service Providers to pay bribes or engage in corrupt practices and expects all Service Providers to act with integrity and to comply with anti-bribery laws. Service Providers must never, directly or through intermediaries, offer or promise any improper benefits in order to obtain an improper advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party.



4. GIFTS AND HOSPITALITY

Receiving gifts or entertainment from people with whom we do business is generally not encouraged.

5. FINANCIAL RECORDS AND ANTI-MONEY LAUNDERING



All business and commercial dealings should be transparently performed, recorded and should be accurately and timely invoiced to the Firm.

We are committed to conducting business in a way that prevents the misuse of our business transactions, so we comply with anti-money laundering, financial crime and anti-terrorism laws in our operations, and expect that our Service providers will also do so.

6. AVOIDING CONFLICT OF INTEREST



All Service Providers must avoid conflicts of interest in their dealings with the Firm. Even the appearance of a conflict is inappropriate and can damage the Firm's reputation. Any ownership or beneficial interest in a Service Provider's business by a government official, representative of a political party or an employee of the Firm must be declared to the Firm prior to entering into any business relationship with the Firm.



7. CONFIDENTIAL INFORMATION

Confidential information includes any information that is not publicly available and includes, without limitation, pricing information, business plans and strategies, sensitive data, personal data, information about our service providers, investors, agreements, or other information that could affect the Firm's brand or reputation.

Service providers must protect the confidential information of the Firm, in accordance with their contractual commitments to the Firm, this Code, and otherwise. Your duty regarding confidential information lasts beyond your engagement with the Firm. Do not share the Firm's confidential information with others even after the cessation of a business relationship with the Firm.



8. DATA PROTECTION

Personal information includes information about anyone such as email address, telephone numbers, credit card information, financial information, medical information, and names of family members.

Keeping personal information secure is critical to our people, our business, and our reputation. Service providers must recognize this responsibility and must at all times comply with applicable data protection laws.

Only collect personal information for legitimate business reasons, and only use it for the purposes for which it is collected. Access only the limited amount of personal information that you need to do your job, and only share it on a need-to-know basis with authorized people who also need the information to complete their work.





9. INTELLECTUAL PROPERTY

The Intellectual Property (“IP”) of the Firm must be protected as a vital business asset. Our Firm’s IP includes our investment themes, internal industry notes, our investment thesis on companies, valuation, our decisions on rejecting opportunities, all copyrights, trademarks, patents, trade secrets, designs, logos, brands, and know-how.



10. INSIDER TRADING

During the course of your association with the Firm, you may get access to information, which is not generally available, and which, upon becoming generally available, is likely to materially affect the price of securities to which such information relates. Such information is called Unpublished Price Sensitive Information (“UPSI”) and it ordinarily includes but is not restricted to information related to financial results, dividends, change in capital structure, acquisition, merger, changes in managerial personnel, etc.

Any person who has UPSI in relation to any company or its securities is considered an ‘insider’. It is illegal to buy or sell securities based on UPSI you may have because of your engagement with the Firm.



11. SUSTAINABILITY AND ENVIRONMENT

Helping build socially responsible and conscious businesses is core to our Purpose & Vision. To achieve this, we have adopted a robust ESG (Environmental, Social & Governance) framework. Our Service Providers should be mindful of this responsibility and should conduct their operations with an aim to incorporate the ESG aspects.

12. REPORTING POTENTIAL MISCONDUCT



Service Providers who believe that an employee of the Firm, or anyone acting on behalf of the Firm, has engaged in illegal or otherwise improper conduct, should report the matter to the Firm. The Service Provider can contact the employee's supervisor or call on helpline number is

India Toll Free #: **18001232880**

Company Code: **10014**

A Service Provider’s relationship with the Firm will not be affected by an honest report of potential misconduct.