

Code of Ethics





Directors' Message

Hello and welcome to the TresVista family!

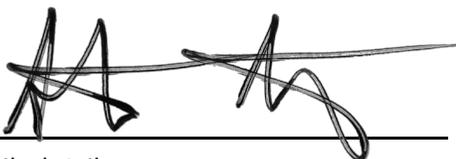
We believe that each individual is a critical part of the team and has the potential to make TresVista a premier global services firm. Our employees are true entrepreneurs, passionate about their contribution to TresVista and take complete ownership and responsibility for the direction the Company heads. We subscribe to the idea that everyone in the TresVista family is collectively responsible to build our strong culture of integrity and excellence.

There is a conscious effort to ensure that the Company culture is conserved and enhanced as we scale. At TresVista, we recognize hard work, effort, and sincerity displayed by the team. We believe in constantly challenging the individuals and motivating them to press ahead. When an individual, or we as a team, deviate from our desired standards, the responsibility is on all of us to get back on track and make this a Company we are proud to be a part of.

We still believe we are a small company and as such there are no cracks to slip through. TresVista is continuously mentoring and cultivating team players who understand the importance of relationships. For better or worse, each individual's experience is shaped by the fact that we expect excellence at every step of the way. When we 'expect' excellence, it means we 'believe' the team is capable of delivering best in class services without compromising on any ethical standards or principles, thereby promoting a corporate culture that adheres to these values

The team's development will always be our priority and we believe that the team has adopted a culture of action and self-motivation, which will allow one to achieve even more.

When we look at the quality of our team, our Clients, and our prospects, we are more excited than ever for the future of TresVista. We look forward to succeeding together!



Abilash Jaikumar



Sudeep Mishra

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1. About TresVista

1.1 History

TresVista, founded in 2006, provides highly skilled outsourcing support to financial services firms across the globe and supports functions - including but not limited to private equity, public equity/fixed-income investors, private credit, investment banks, corporate advisory firms, and corporates. Supported functions include investor relations, deal sourcing, deal execution, data analytics, valuation, research, financial modelling, portfolio management, and fund administration.

1.2 Mission Statement

To be recognized as the highest quality financial and consulting services provider through:

- Building a team of industry leading talent capable of providing best in class support
- Consistent dedication to excellence and quality
- Active participation in the growth and success of our clients

1.3 PACT

The culture of TresVista is built on the founding pillars of the PACT

People

'We recognize and value that people are unique and multifaceted. We give people the freedom to contribute to the improvement of the organization. We encourage creativity and support enthusiasm.'

Action

'We encourage active decision making and getting the job done. We act rather than react.'

Clients

'We strive to be close to the customer. We learn from the people we serve in order to continuously improve our quality.'

Team

'We succeed together.'

2. Code of Ethics

The code of ethics is a set of standards adopted to govern the conduct of our employees

2.1 What is the Code of Ethics?

- It is defined as a written set of principles issued to the employees and management to help them conduct their actions in accordance with the organisation's primary values and ethical standards
- These ethical standards or principles help to set the tone of the organization
- The employees should adhere to the core ethical principles for guidance in decision-making and business conduct

2.2 Purpose of the Code of Ethics

- This code of conduct clarifies TresVista's mission, values, and principles, linking them with standards of professional conduct
- It articulates the values TresVista wishes to foster in employees and, in doing so, defines desired behaviour. Thus, becoming a benchmark against which individual and organizational performance can be measured
- It serves as a guide to set common ethical standards to promote consistency in behaviour across all designations and departments
- It establishes a direction and a pathway to meet the organization's ethical responsibilities to its stakeholders

3. Principles

3.1 Competence

- To develop and maintain the relevant knowledge, skills, and behaviour to ensure that any activity is conducted professionally and proficiently, which includes acting with diligence, as well as obtaining, and regularly updating, the appropriate qualifications, training, expertise and practical experience
- To ensure that each employee understands and complies with any applicable laws, rules, regulations, and internal policies

3.2 Integrity

- To encourage employees to behave in an accountable and trustworthy manner and avoid any acts that might damage the reputation of, or bring discredit to the organisation at any time
- To encourage employees to personally escalate non - compliance issues appropriately
- To ensure reasonable diligence is exercised when approving transactions and expenditures or signing documents
- To understand the importance of internal controls and consistently comply with them
- To not solicit or accept anything of value from anyone (directly or through others such as family members) if it is intended or could reasonably appear as intended to improperly influence the decisions to be taken on behalf of TresVista
- To ensure that employees who have confidential information about a principal, supplier, customer or competitor do not trade in that organisation's stock, nor should any employee advise others to do so

3.3 Fair Dealing, Diversity and Equal Opportunity

- To create a culture of fairness and transparency, which includes treating those with whom we have professional relationships with respect and to ensure that employees consider the impact of their decisions and actions towards all stakeholders
- To not hire or fire, reward or punish, or award or deny contracts based on personal considerations, including but not limited to, favouritism, nepotism, or bribery
- To not tolerate any discrimination amongst employees, business partners or clients based on, but not limited to, gender, race, age, religion, disability, nationality, or sexual orientation

3.4 Confidentiality

- To follow the highest standards of information security to keep any client information confidential in order to protect the confidentiality and sensitivity of the information provided by them
- To ensure that any data shared by the clients is used for intended purposes only and any sensitive information is not divulged to anyone, including third parties, without the explicit consent of those involved - unless disclosure is required by law or regulation
- To believe that all information about the organisation and its business (including the past, present and prospective client, business partners, vendors, directors, and employees) is confidential unless otherwise stated

- To never share user IDs, passwords, access details, software, services or authentication devices that are intended for individual use to gain access to a system
- To train our employees to respect the organisation's security controls and access information only within their authorized access level
- To keep in line with the laws and regulations that prohibit the misuse of sensitive client information, we ensure that delivery teams do not buy or sell securities in their own account or any account over which they exercise control when they have any information relating to those securities
- To ensure employees do not pass along any sensitive information or tip anyone to buy or sell securities whilst in possession of such information relating to those securities

3.5 Communication

- To ensure client communication should be complete, accurate, professional, and consistent with the stated duties to clients
- To avoid phrasal verbs, contractions, colloquial, and text speak in any written communication whether internal or external
- To proofread all emails prior to sending and use a business email address with a proper signature
- To use electronic communications technology maintained by the organisation responsibly and professionally
- To ensure and foster open lines of communication amongst team members
- To avoid exaggerated or inaccurate statements that could be easily misunderstood or used against TresVista in legal proceedings
- To ensure client communication is complete, accurate, professional and consistent with the stated duties to clients

3.6 Commitment to Quality

- To make a reasonable inquiry into a client or a prospective client's requirements, industry practices, business requirements, and constraints, if any and strive to reassess and update this information regularly
- To ensure that any completed product is suitable and consistent to the client's written objectives, mandates, and specified orally, via emails or in line with the terms of the signed agreement
- To recommend only services/solutions that we believe are a proper fit for each customer's needs
- To ensure we deliver unmatched quality to our clients by helping every employee fully embrace the ethos of utmost diligence and establish multiple levels of quality checks and instant investigation and correction of any deviations
- To be honest, and upfront in advertising and marketing claims to avoid misrepresentation, exaggeration, ambiguity
- To reduce complexity and excel at execution

3.7 Corporate Social Responsibility

- To constantly look for ways to contribute to the well-being of our local communities – by supporting charitable activities financially and non-financially, through volunteering efforts
- To monitor, manage and reduce any negative impact TresVista might have on the environment and on human rights and strive to maximise the positive ones

3.8 Ownership

- To act with reasonable care and exercise prudent judgement
- To accept responsibility for any decisions or actions that may impact the organisation's interests or stakeholders
- To act for the benefit of our clients and place their interests before the organisation's or our personal interests
- To ensure accuracy and completeness in the delivery of our services
- To display consistency between our speech and actions
- To have zero tolerance for both internal and external fraud
- To report potential or suspected violations of the Law or Tresvista policies including situations when we know or suspect other employees or third parties are, or about to be engaged in illegal, inappropriate or unethical activity

3.9 Partnership

- To work with others to develop solutions and break down internal barriers
- To assume positive intent in working with others, value and encourage diversity
- To share ideas and resources across the organisation for scale and impact
- To manage resources rather than owning them
- To build effective relationships with colleagues and industry partners to enable others to be successful
- To discuss the importance of ethics and compliance regularly with all team members
- To deliver and seek timely, candid and actionable feedback
- To encourage fair competition between any potential suppliers
- To encourage suppliers to comply with the sound business practices we embrace, follow the law and conduct activities in a manner that respects human rights
- To build a positive working environment, along with the responsibility to speak out and ask for a change if any conduct that runs contrary to this principle is observed

3.10 Health and Safety in the Workplace

- To be cautious and do nothing that might endanger or harm our business associates in any way – whether they are colleagues, clients, partners, competitors, visitors or anyone else
- To keep our workplaces safe by following health and safety norms, ensuring a safe, dignified and productive work environment

4. Violating the Code

4.1 Disciplinary Procedures

- Anyone who breaks the rules (whether it is our code, TresVista policies or outside laws, rules, and regulations) will face the consequences – from reprimands and warnings to dismissals
- This would include not just the person who broke the rules, but also their line manager and anyone who knew about the breach and did not report it
- For cases, where someone has broken the law, we will not hesitate to report them to the relevant authorities

5. Upholding the Code

- The Board of Directors (Board) and the Management of the organisation are committed to the maintenance of high standards of ethics, honesty, and integrity, and promoting a corporate culture that adheres to these values
- TresVista will not accept any justification or excuse for breaking the code, whatever the reason – whether for profit, convenience, or competitive advantage or because a client or someone else asked for it

5.1 Whistle Blowing and Raising Concerns

- TresVista is committed to the highest standards of moral and ethical behaviour. TresVista is also committed to having zero tolerance for both internal and external fraud
- Each Employee at TresVista is its ambassador and is expected to uphold the principles of honesty and integrity, on which TresVista is built. To ensure ethical behaviour; TresVista considers it appropriate to provide a channel to its employees and stakeholders to speak up when they see behaviour inconsistent with its values
- TresVista also strives to create an honest, open and well-intentioned working environment where people are confident of raising their concerns without fear of reprisal, retaliation, discrimination or any kind of harassment
- Any concerns involving unethical behaviour should be reported via email to the Ethics Committee at coe@tresvista.com

5.2 Ethics Committee Review

- On submission of any concerns, the Ethics Committee will review the findings of the investigation
- The review process would be conducted in a fair manner, as a neutral fact-finding process, without presumption of guilt
- Post the review process the Ethics Committee will direct appropriate corrective/preventive disciplinary action where it feels that there is a reason to believe there is a fault
- The decision of the Ethics Committee comprising of all members or management representatives shall be binding and final. In the event of a dispute arising between the members while evaluating the appropriate corrective/preventive disciplinary action, the decision of the Board of Directors shall prevail
- Decisions to prosecute or refer the examination results to the appropriate law enforcement and/or regulatory agencies for independent investigation or seek expert advice will be made by the Ethics Committee in conjunction with the Legal Counsel

5.3 Reports and Documents

- Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of Subjects subsequently found innocent of wrongful conduct and to protect the Company from potential civil liability
- All disclosures made by the Ethics Committee, the ethics committee report and the documents obtained during the course of any investigation, along with the results of investigation relating thereto, shall be retained by TresVista for a minimum period of 4 years
- Head of Department – Human Resources will submit on a semi-annual basis to the Board and management, a summary of the reported concerns, if any, highlighting the following:
 - The nature of the reported cases under this code and the proposed action thereon;
 - The status of prior and current period reported cases and the action taken thereon; and
 - Results / status of any investigations / enquiries in reference to the cases reported

5.4 Changes to the code

- The code defines the way we do business. It is reviewed annually to make sure it reflects our principles and standards and is consistent with the law
- Whenever any changes are made to the code, the same is communicated to all the employees
- Head of Department- HR is responsible for the administration, revision, interpretation, and application of this code

5.5 Affirmation Process

- Each employee declares that they have read and affirmed their awareness of the code, as part of their annual affirmation process

6. Legal Notice

This Code serves as a reference to you. TresVista reserves the right to modify, suspend or revoke this Code and any policies, procedures, and programs in whole or in part, at any time, with or without notice. TresVista also reserves the right to interpret this Code and these policies in its sole discretion as it deems appropriate.

Neither this Code nor any statements made by any employee of TresVista, whether oral or written, confer any rights, privileges or benefits on any employee, create an entitlement to continued employment at TresVista, establish conditions of employment, or create an express or implied employment contract of any kind between employees and Tresvista. Also, all employees should understand that this Code does not modify their employment relationship, whether at will or governed by a written contract.

