CareEdge
GLOBAL RATINGS
A subsidiary of CARE Ratings Limited

Broader Principles For dealing with Conflict of Interest

DOCUMENT CHANGE CONTROL

Version	Author / Owner	Date	Outline of changes
1.0	Compliance Officer	27-09-2024	As per the IFSCA (Capital Market Intermediaries) Regulations, 2021
1.1	Compliance Officer	10-10-2025	Reviewed
1.2	Compliance Officer	08-07-2026	Amended and aligned

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CAREEDGE GLOBAL IFSC LIMITED

BROADER PRINCIPLES FOR DEALING WITH CONFLICT OF INTEREST

To avoid conflict of interest and make adequate disclosure of its possible conflict of interest and duties, CareEdge Global IFSC Limited ("the Company" or "CGIL") has put in place a mechanism to resolve any conflict-of-interest situation, details of which are as follows-

A. Segregation between Rating Business and other business activities.

1) Rating Analytical function and other business activity functions will be separate team and will be operate independently. Each function shall have distinct reporting lines. Employees performing Rating Analytical and Business Development functions shall strictly adhere to the Company's Policy on Segregation and Firewall, thereby ensuring an appropriate separation of responsibilities and preventing conflicts of interest. Any legal arrangements towards shared services/ resources between Company and its group entities shall apply.
2) Employees from Rating analytical function shall not participate in any kind of negotiation of fees, marketing, business development or client solicitation.
3) Employees from Business development function shall not participate in any rating assessments and committees deliberations. Rating assignments shall be undertaken through a team-based analytical approach, and final rating decisions shall be made by the Rating Committee to ensure the incorporation of diverse perspectives and to minimize the potential for individual bias.
4) Rating Fees is not linked to outcome of the rating assignment.
5) Analytical compensation will not be linked to the Rating Fees.
6) Assignments will be conducted by the team and final rating will be assigned by the Committee to incorporate multiple opinions and avoid individual bias, if any.

B. Restrictions on holding Securities and limitations on investments by Credit Rating Agency at entity level:

1) Employees and their immediate relatives/ dependent cannot invest in the securities of issuers rated by the Company.
2) Employees can invest in securities not rated by the Company, after taking the prior approval of the Compliance Officer.
3) The members of the Rating Committee shall upfront declare / disclose their interest, if any, to the Compliance Officer, in the securities /instruments/ facilities that are considered for rating by the Company.
4) The Compliance Officer can trade after taking the prior approval of the Chief Executive Officer ("CEO").
5) All the employees will abide by the provisions of Code of Conduct for Directors, Rating Committee Members and Employees of CGIL.
6) The Internal Rating Committee members cannot invest in the securities of issuers rated by the Company.
7) The Independent External members, if any, of the Rating Committee shall not participate in the discussion for assigning rating to the entities in which he/she or their dependents holds any investment.
8) The Company shall not invest its surplus funds, if any, in the securities of any entity rated by the Company and such investments shall be governed by and subject to the investment policy approved by the Board, which shall be in line with all regulatory guidelines.
9) All the employees (rating team and other than rating team) and the Rating Committee Members shall submit the necessary disclosures and statement of holdings as prescribed in the Code of Conduct for Directors, Rating Committee Members and Employees of CGIL.

C. Provisions relating to disclosures

All the employees (rating team and other than rating team) and the Rating Committee Members shall submit the necessary disclosures and statement of holdings as prescribed in the Code of Conduct for Prohibition of Insider Trading of the CGIL.

D. Governance-Board and CEO Role

1) CEO shall not be a member of the Rating Committee.
2) Board of Directors shall not participate in any Rating Committee meeting and its processes.