

Policy on Management of Conflict of Interest

Of

Bandhan AMC Limited

Document Version Control

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1. Introduction

Regulation 24 of SEBI (Mutual Funds) Regulations, 1996 (“MF Regulations”) mandates that the asset management company shall ensure that there is no material conflict of interest across its various activities like management of mutual fund and investment strategies launched under Specialized Investment Fund along with management and advisory services provided to pooled assets including offshore funds. Similarly, SEBI (Portfolio Managers) Regulations, 2020 (“PMS Regulations”), SEBI (Alternative Investment Funds) Regulations, 2012 (“AIF Regulations”) and International Financial Services Centres Authority (IFSCA) (Fund Management) Regulation 2022 (“FM Regulations”) also mandate the asset management company to establish and implement written policies and procedures to identify, monitor and appropriately mitigate conflicts of interest in the business activities.

Further, SEBI vide its circular no. CIR/MIRSD/5/2013 dated August 27, 2013¹, had issued general guidelines to all registered intermediaries for dealing with conflict of interest.

In the view of the above, Bandhan AMC Limited (“the AMC/Bandhan AMC”) has formulated a policy on Management of conflict of interest between various business activities i.e. Mutual Funds (including the investment strategies launched Specialized Investment Fund), , Portfolio Management Services (including Advisory Services), Venture Capital Fund, Alternative Investment Funds (“AIF”) and Management of Funds in Gift City through AMC’s Branch office (“Gift City Branch”) etc.

A reference to Bandhan AMC Limited shall also mean the Gift City Branch.

This document sets out the AMC’s policy on Managing Conflicts of Interest (the “Policy”). This Policy provides minimum standards for these matters within AMC to ensure adherence with the framework for managing conflicts of interest as envisaged by SEBI circular no. CIR/MIRSD/5/2013 dated August 27, 2013, MF Regulations, PMS Regulations, AIF Regulations and FM Regulation.

2. Objective

This policy seeks to address potential conflicts of interest that may arise during business and operations as a regulated entity and to provide for a framework for managing conflicts.

In addition, Bandhan AMC makes a dedicated effort to ensure that its employees understand and adhere to applicable laws and regulations as well as general ethical standards.

3. Scope

- Regulatory Requirement
- Policies & Procedures
- Supervisory Responsibility – Executive Risk Management Committee (ERMC) & Compliance Officer of the AMC and Gift City Branch
- Disclosure to Client

¹ [SEBI | General Guidelines for dealing with Conflicts of Interest of Intermediaries, Recognised Stock Exchanges, Recognised Clearing Corporations, Depositories and their Associated Persons in Securities Market](#)

- Chinese Wall Framework & Information barrier
- Dealing with Confidential & Inside Information
- Periodicity of review
- Exceptional circumstances

4. Policy Owner

Compliance Officer of the AMC and Gift City Branch (“Compliance Officer/s”) shall be the custodian of this document.

5. Policy Review

The policy shall be reviewed at least once in a year. Any new circular/guideline which leads to any modification to any process/limits set out herein shall be deemed to form part of this process. The policy will be amended as required and the amended policy will be placed in the forthcoming Board meeting of the AMC and Trustees for their approval.

6. Record Keeping

Records shall be preserved in accordance with SEBI Regulations and other applicable Regulations, issued from time to time, to various lines of businesses. The AMC has also formulated Document and Record Retention Policy providing conditions and standards of record keeping.

7. Terminology used in this Policy

In this Policy some words and terms are used to express certain concepts. These are described below.

Associate: An Associate shall have the same meaning as provided in the respective regulations under which the activity is regulated. In case a regulation does not define associate, it shall have same meaning as provided in the Companies Act, 2013.

Conflicts of Interest (“COI”): Within the context of this Policy, apart from various other conflicts that may arise, four main types of conflicts are considered: (1) conflicts between the interests of business units of the AMC; (2) conflicts between the interests of two or more clients serviced by the same business unit; (3) conflicts between the interests of one or more clients and the AMC / business unit; (4) Conflict of interest with associated persons.

Confidential Information: Any item of information (written or otherwise) obtained in the course of an employee’s employment, which is not in the public domain and which is related to Bandhan AMC transactions (for all the businesses), its clients, or third parties, that is subject to confidentiality (either by agreement or otherwise).

Chinese Walls: The system of policies, procedures and physical arrangements used to manage various lines of business independently.

Inside Information: Confidential Information of a precise nature that is related to one or more

issuers of financial instruments, or information about the AMC, which is likely to have a material impact on the price of a financial instrument or a related derivative of a financial instrument when made public.

Management: The executives, so appointed, who are individually or jointly responsible for the decision-making, general operation and administration of business lines, business units, legal entities, branches, internal committees and similar parts of the Bandhan AMC.

Need-to-know: Communication of Confidential Information shall not take place unless strictly required for a legitimate purpose, proper discharge of the employee's function or discharge of legal obligations, and is not contrary to the terms of any confidentiality agreement.

8. General responsibilities for compliance with this Policy

8.1 Management

Management is responsible for the effective execution and supervision of this Policy and procedures laid down herein. In addition, Management is responsible on a day-to-day basis for fostering an environment such that employees under their control understand and comply with this Policy.

Management duly supported by the Departmental Heads shall effectively ensure that all the processes comply with the procedures laid down and shall proactively monitor and report potential conflicts in their respective department and across business units of the AMC, if any.

8.2 Role of the Executive Risk Management Committee (ERMC)

Constitution of ERMC - Bandhan AMC has constituted an executive committee viz., Executive Risk Management Committee ("ERMC") ('The Committee'). The Committee is constituted of the Head of each Department / Function of Bandhan AMC including Principal Officer of GIFT City. The Chief Executive Officer ("CEO") acts as the chairperson for the Committee. The meetings of the Committee are conveyed at monthly frequency. The minutes of the meeting are duly maintained and are also reviewed by the Internal Auditors.

The Committee has representation from each department of the respective business unit.

Members of ERMC shall report any exceptions to this policy to the Committee at its periodic meetings. The Committee shall be entrusted with the responsibility to review at periodic intervals areas of conflict / potential conflict of interest and suggest mitigation mechanisms to address such conflict to the management across various business activities of the AMC. In the unlikely event that a member of the Committee believes he or she might have any actual or potential conflict of interest regarding the matter under consideration, such member must recuse himself or herself from discussion of that matter during the Committee meeting and not participate in decision making.

Records of the key conflicts of interest shall be maintained by the Committee. It shall be the responsibility of each department and function to report to the Committee the various conflicts of interest, existing as well as new, that arise or exist in their respective areas.

This policy will be updated if a material conflict of interest is identified. Based upon recommendation of the Committee, any changes / updation in the policy would be placed before the Board of AMC and Trustees. Incidents, if any, pertaining to violations of this Policy shall be reported to the Committee.

8.3 Role of the Compliance Officer

Compliance Officers of AMC and Gift City Branch will assist the Management / Committee with the development and implementation of the policies and/or procedures. Compliance Officers are also responsible for providing information related to this Policy and procedures and regulations.

In addition, the internal auditors of the AMC shall perform checks on compliance with the provisions of the policy and report their findings to the Audit Committee of Bandhan AMC, as required under the respective regulations.

8.4 Role of the Board of Directors of the AMC

The Board of the AMC, with support of the Senior Management, will review the compliance with the Policy periodically. Incidents, if any, pertaining to conflict of interest and/or violations of this Policy shall be reported to the Board.

Further, the Principal Officer of the Gift City Branch shall ensure that it complies with all the regulations/guidelines/circulars, as issued from time to time, and shall be responsible for the risk management.

In case of circumstances where the existing measures of managing conflict of interest are not considered to be adequate, the Senior Management may seek guidance from the Board.

9. Regulatory framework for managing conflict of interest

Bandhan AMC offers various investment products and advisory services to its clients. Bandhan AMC is the asset management company of Bandhan Mutual Fund which offers various mutual fund schemes and Specialized Investment Funds for investment. It is also a registered portfolio manager, under which it can offers discretionary and non-discretionary portfolio management services. It is investment manager for SEBI registered venture capital funds (VCF) and alternative investment funds (AIF).

Further, the Gift City branch of the AMC shall act a fund management entity for the investment vehicle or funds managed in the Gift City.

Regulation 24(b) of the MF Regulations, Regulation 21 of the AIF Regulations, Schedule III of PMS Regulations and SEBI circular no. CIR/MIRSD/5/2013 dated August 27, 2013 requires the SEBI-registered intermediaries as well as Part D of Schedule III of FM Regulation requires IFSCA-registered intermediaries to put appropriate policies and procedures in place to manage conflict of interest among its various activities.

Parameters envisaged by the regulatory requirements for which policies and procedures need to

be put in place are as follows:

- Process for identifying conflict and setting up policies and procedures with involvement of senior management;
- Segregation of back office operations, fund managers, bank and securities accounts among various activities, as required under the respective regulations;
- Maintenance of integrity in conduct of business;
- Exercising diligence while transacting in securities;
- Code of Conduct for the employees;
- Maintenance of Ethics during Sales;
- Framework to manage conflict between various client, schemes as well as client or scheme v/s proprietary interest;
- Disclosure to client of potential conflict;
- Institution of Chinese wall framework and information barrier;
- Restriction on transaction in securities and communication by employees;
- Dealing with inside and confidential information;
- Ensure fair treatment of all investors/client.

10. Policies and Procedures

Considering the nature of business undertaken by Bandhan AMC, following are the policies and procedures which have been put in place relating to each parameter of the regulatory framework listed above.

10.1 Identification of conflict and setting up policies and procedures

There might be several conflicts that may arise in the general functioning of the AMC and multiple permissible activities being carried out. The AMC has formulated appropriate information security policies and requirement for consultants and contractors to sign a confidentiality agreement. Further, the AMC has various policies and procedures in place to mitigate potential COI.

10.2 Maintenance of integrity in conduct of business.

As prescribed in the AMC's Code of Conduct for its employees, it is important that honesty and trustworthiness, are demonstrated so that our customers are confident that their dealings with Bandhan AMC will always be just, fair and safe. Usage of funds and property of the Company or that of the clients / investors for personal benefit of the employee, or knowingly assisting another person (whether an employee or not) in such inappropriate usage, is strictly prohibited.

Except as permitted under the Code of Conduct, employees and their immediate family members are not permitted to accept gifts, entertainment or other favours from existing or prospective customers, suppliers or others whom they may contact in the course of the AMC's business unless as specified under the Gift and Entertainment Policy.

The HR team shall be responsible for any omission or commission by its employees and the persons whose services has been procured by the it. Notwithstanding anything contained in any contract or agreement or termination, the Gift City Branch and the Senior Management, shall not be absolved of liability to the scheme or its investors for their acts of

commission or omission, while holding such position or office.

10.3 Exercising diligence while transacting in securities.

As prescribed in the AMC's Code of Conduct, the AMC's personnel shall not, in respect of any securities, be party to-

- creating a false market
- price rigging or manipulation
- passing of price sensitive information to brokers, members of stock exchanges and other players in the capital markets or take action which is unethical or unfair to investors.

10.4 Maintenance of Ethics during Sales.

As prescribed in the AMC's Code of Conduct, in all communications, including sales presentations and advertising, there will be adherence to truth and there will be no attempt to mislead directly or indirectly. This rule is intended to be followed not only to the letter, but also in spirit. It includes avoidance of making false statements, but is also intended to rule out misleading by omission. Further, every employee ensure that before releasing any sales literature, the said literature has adequate approval in place before release of the same.

Bandhan AMC has formulated a Code of Conduct which inter alia covers detailed guidelines on the above aspects. The Code of Conduct is applicable to all the employees of the AMC and is provided to each employee at the time of joining. Further, an annual declaration is sought confirming compliance with such Code of Conduct from each employee.

10.5 Framework to manage conflicting scenarios:

Framework to manage conflict between various client/schemes including investment strategies launched under Arudha SIF (hereafter collectively referred as "scheme(s)") as well as client/scheme v/s proprietary interest:

a. AMC's own investments in the schemes of Bandhan Mutual Fund

As part of normal business practice, Bandhan AMC may invest its own money into one or more schemes of Bandhan Mutual Fund. This investment is treated in a manner that does not conflict with the interests of any investor of the relevant scheme. Bandhan AMC is treated like a normal unitholder of the relevant scheme. Further, in terms of SEBI Regulations, no management fees shall be charged on the investment made by Bandhan AMC in the Schemes.

b. AMC's own investments in the schemes of AIFs managed by the AMC or funds/investment vehicle managed by Gift City branch

As part of normal business practice, Bandhan AMC may invest its own money (as Continuing interest or otherwise) into one or more schemes of AIFs managed by Bandhan AMC or in funds/investment vehicle managed by Gift City branch. In case of investment done Bandhan AMC in ant of its AIF funds, it will be treated in a manner that does not conflict with the

interests of any clients or investor across of the relevant schemes/investment vehicle and shall be in line with the regulatory framework. Bandhan AMC shall be treated like a normal investor/unitholder of the relevant scheme and will adhere to the regulatory provisions in this regard.

c. Fairness of trading allocation and order priority amongst schemes

Bandhan AMC has a process of allocating trades between schemes of mutual funds at weighted average price on execution of basket orders in line with the deal execution policy laid down by the AMC. Further the process for trade allocation and order for AIF/PMS/Gift City branch shall be managed by fund manager/dealer of the respective line of business individually, in line with the process laid down by the AMC as per regulatory framework.

d. Inter-scheme transactions in the schemes of Bandhan Mutual Fund

Inter-scheme transactions in the schemes of Bandhan Mutual Fund may present potential conflicts of interest and may be viewed as favouring one scheme over another. To avoid such conflict, the inter-scheme transactions are effected at the prevailing market prices and it is ensured that such transactions are within the investment objectives, asset allocation pattern and investment strategy of the respective scheme. The Valuation Policy of Bandhan Mutual Fund covers in detail the process related to pricing for inter-scheme transfers of mutual fund schemes. Further the AMC has also adopted Valuation policy for other line of business as may be applicable.

e. Inter-scheme/funds Investments

Inter-scheme investments may present potential conflicts of interest. To avoid such conflict, the inter-scheme investments are effected at the prevailing market prices and it is ensured that such transactions are within the investment objectives, asset allocation pattern and investment strategy of the respective schemes/funds and regulatory framework. Further, such investments shall be subject to requisite approvals or disclosures etc. which shall be complied with in accordance with applicable laws.

f. Investments in securities issued by sponsors and associates

Investments in securities issued by sponsors and associates may present potential conflicts of interest and may be viewed as favouring the issuer. To avoid such conflict among various business verticals, it is ensured that such transactions are done at prevailing market prices and at arm's length basis. The Fund Managers ensure that the transactions are in the best interest of the scheme/funds, are within the investment objectives, asset allocation pattern and investment strategy of the respective scheme/funds, and the investment decision is supported by appropriate research recommendation with investment decision rationale recorded.

g. Segregation of voting function and client relations / sales function:

A segregation of proxy voting and client functions is implemented to eliminate potential conflicts in the proxy voting process. The personnel involved in voting function do not include anyone whose primary duties include external client relationship management or

sales. The AMC has Voting Policy in place in line with SEBI regulations, which define the modalities for the exercise of vote for the mutual fund schemes on the resolution of the investee companies. The Voting policy is also uploaded on the website of the AMC.

h. Transaction in securities by employees:

The AMC has adopted Dealing Guidelines for the Employees' Personal Securities Transactions for the transaction done by the employees of the AMC. The policy intends to provide the guidance in terms of applicable SEBI regulations in respect of their personal securities transactions. The policy specifies the covered investment, approval and reporting requirements, holding period, contra trade etc. applicable to the employees of the AMC w.r.t their personal transactions. Further it also specifies the prohibitions and restriction applicable to the employees of the AMC. A copy of the same is provided to each employee at the time of joining and an annual confirmation of compliance with the policy is obtained from each of the employee.

i. Chinese Walls:

Each activity of the AMC is appropriately segregated to ensure that each activity is independently carried out in the interest of their respective business.

The following measures have been implemented to ensure segregation of activities between each line of business:

i. I.T. Infrastructure:

The Infrastructure facility is designed in a way that the dealing and investment room (trading room) for the businesses of the AMC (i.e. between MF & other business activities of the AMC) are segregated with separate infrastructure facilities i.e., log-ins for the order placement system, recorded lines etc. The offshore activities, being domiciled outside India, are also segregated from the AMC's infrastructure in India.

ii. Access Control:

There is restricted access to the dealing rooms across the businesses. The investment team personnel of each fund management/dealing room are not given access to the fund management/dealing rooms of the other businesses.

iii. Access to data on common drive:

Data on the shared drives has been enabled for various departments to facilitate data storage and retrieval by a designated group. Regular data backups for the share drive is performed. Access to common drive is controlled through access list and provisioned to employees only upon the line manager's approval..

iv. Key personnel:

The key personnel including fund management team, dealers and back office operations of the Mutual Fund and other business activities of the AMC are segregated as per the required applicable regulations. Further the fund management team, dealers and back office operation for various other business activities like PMS/AIF/Advisory are segregated from Gift City branch.

v. Bank account, securities accounts and custody accounts:

The bank and securities accounts have been segregated between the mutual fund operations and other business activities like PMS/Advisory/VCF/AIF/Gift Branch operations etc. with establishment of Chinese walls.

j. Code of Conduct:

The AMC has adopted Code of Conduct to be signed and submitted by all the employees which provide detailed procedure in case of any outside affiliations of the employees. Further the code covers the following –

- Gift and Entertainment Policy to be followed by the employees for exchange of Gift with any third party. The limit and the procedural requirements to be followed by the employees is specified by the Code.
- Outside affiliation of the employees – The Code specifies the requirements and process to be followed by the employees of the AMC in case of outside affiliation like serving as a director, trustee, officer, owner or partner of any other organization or affiliation with any political parties. No employee shall engage in any outside or political affiliation except with the prior written approval as specified in the Code of Conduct

k. Outsourcing Policy –

The AMC has adopted Outsourcing Policy which specifies risk management program to be considered for assessing risks associated with Outsourcing of the activities, details of the contracts w.r.t. outsourcing activity, procedure of outsourcing etc.

l. Providing advisory services by the AMC

The AMC may, from time to time, act as investment managers or advisers to other funds under its advisory license /registration, where the fund which the AMC manages or advises can follow similar investment objectives/strategy managed by the AMC. It is therefore possible that the AMC may in the course of their business have potential conflicts of interest with the recipient of the advisor or the Fund it manages. In such cases the AMC shall as per its obligation as manager or advisor shall act in the best interests of the all the investors/clients.

10.6 Disclosure to client of potential conflict.

In case of unavoidable conflicts of interest (existing or potential), appropriate disclosure of the general nature of the conflict of interest (including the source of conflict of interest) shall be made to the affected clients in order to assist them to take informed decision.

10.7 Institution of Chinese wall framework and information barrier.

Bandhan AMC has established policies, procedures and physical arrangements (collectively 'Chinese Walls') designed to manage confidential information and prevent the inadvertent spread and misuse of inside information.

In general, Chinese Walls separate areas that have access to Inside Information (“Insider Areas”) from those who do not have such access (“Public Areas”). As such, Chinese Walls are designed to operate as barriers to the passing of Inside Information and Confidential Information. Chinese Walls are also designed as a means of managing Conflicts of Interest.

Where Chinese Walls arrangements are in place, employees working within an Insider Area are prohibited from communicating any Confidential or Inside Information to employees in Public Areas.

Employees within a Chinese Wall have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the ERMIC immediately.

The establishment of Chinese Walls is not intended to suggest that within Insider Areas material, Confidential Information can circulate freely. Within Insider Areas, the ‘need-to-know’ policy is fully in effect. Information of schemes/Clients, transactions in securities undertaken on fiduciary capacity should be handled with due care and provided only on ‘need-to-know’ basis.

10.8 Common functions across Chinese Walls

As a result of their function, certain employees may have access to information from departments that are separated by Chinese Walls. Also, there would be certain employees whose role requires them to transcend the Chinese Wall.

Such persons also have the additional responsibility to ensure that Inside Information from one side of a Chinese Wall is not spread to other areas (for instance during meetings attended by employees located on all sides of a Chinese Wall).

Such persons include the CEO, Head of Operations, Legal & Compliance team, Risk Team and other support functions like customer service team, IT support team and operations team etc.

Additionally, the research database / personnel and customer service staff may be shared across the activities.

10.9 Dealing with inside and confidential information.

Confidential Information

Senior Management shall ensure that the key principles driving the dissemination of Confidential Information are communicated to all employees. These key principles include the Need-To-Know principle and the respect of any confidentiality agreement signed with a client. Operations & IT systems will also be constrained to reflect these key principles.

All employees must understand that they should treat Confidential Information with due care and that they have a duty to safeguard Confidential Information. All such information shall only be used for its intended purpose and must not be used for any personal employee benefit or Bandhan AMC’s general benefit.

Thus, Confidential Information must only be used for the specific purpose or transaction for which it was given and must be circulated on a strict 'Need To Know' basis.

Inside Information

All managerial responsibilities regarding Confidential Information above apply also to Inside Information.

The AMC follows the SEBI (Prohibition of insider trading) Regulations, 2015 as amended from time to time and Dealing Guidelines for the Employees' Personal Securities Transactions ("the Guidelines") for all the employees for their personal transactions in securities while in possession of Inside Information. Therefore, Senior Management ensures that policies and/or procedures are in place designed to preclude any employee from trading, based on Inside Information.

All employees have been informed that they must take additional care when communicating while in possession of Inside Information; employees shall not only respect the 'Need to know' policy with respect to internal sharing of Inside information, but also respect existing Chinese Wall arrangements. Furthermore, employees have been explained that they must not pass any Inside Information to any third party either expressly or by way of making any recommendation for the purpose of buying or selling securities.

Restriction on investments in securities

During our interaction with the investee companies as part of stewardship activity, it is possible that the employees may gain access to material non-public information. Wherein the Employees who are in possession of such material non-public information are required to inform the ERMC regarding such conflict of interest. In such cases, the ERMC may impose blanket ban on transactions in such securities. Any such restrictions shall be lifted only when the information has been made public or a confirmation has been received that the information is no longer relevant.

10.10 Fair Treatment of all investors/clients.

Bandhan AMC is committed to maintaining trust and integrity is essential to our relationships. Therefore, we will implement procedures to identify, disclose, and manage any potential conflicts of interest that may arise. Our aim is to ensure that all investors and clients receive equal access to information, services, and opportunities, without favoritism or bias. This commitment underscores our dedication to transparency and ethical conduct in all our dealings.
