SMFG India Credit Company Limited

Group level Anti-Bribery & Anti-Corruption Policy

1. Context

Under the provisions of the Prevention of Corruption Act, 1988, abetting the act of bribing a public servant or a government employee is a punishable offence. The bribery and/or corruption increases uncertainty in business and can have grave reputational and financial consequences. The instances of bribery and/or corruption may expose the SMFG India Credit Company Ltd. and its wholly owned subsidiaries (collectively called as 'Group') to reputational and legal risk. This Policy underscores the Group's zero tolerance for bribery and corruption.

2. Applicability

This Policy is applicable to all the Associated Persons.

3. Definitions

- **i. Associated Person (AP):** shall mean to include but not limited to individuals, directors, employees of the Company or persons related as a friend or family member acting on behalf of the employee, consultants, business partners, vendors, service providers and any other person / entity acting for and on behalf of the Group (collectively called as 'third parties').
- **ii. Bribery:** shall mean it is an offering, promising, giving, accepting or soliciting of an advantage as an inducement or reward to influence an action which is illegal, unethical or a breach of trust.
- **iii. Corruption:** shall mean the misuse of entrusted power for private gain.
- **iv. Designated Authority (DA):** The Chief or Group Compliance Officer of the Company.
- **v. Employee:** as defined in the Code of Conduct of the Companies.
- **vi. Entertainment:** shall mean the provision of meals, leisure activities or travel at a Company's expense and/or the receipt of meals, leisure activities or travel at the expense of current or prospective business clients or vendors. It excludes customary expenditures that are small in value such as light refreshments, coffee or tea provided to our business clients or vendors at the time of their visits to a Company or provided to us at the time of our visits to current or prospective business clients or vendors.
- **vii. Facilitation Payments:** shall mean unofficial payments made to speed up or secure routine government actions by a Public Official.
- **viii. Gift:** shall mean items or money provided or accepted free or below market value; excluding promotional items allowed by law and social norms.
- **ix. Public Officials:** shall mean a public servant, who performs duties for the government or public interest. This includes not only government employees but also those working in local authorities, government-aided institutions, and even private individuals temporarily fulfilling public roles under law, including politicians and political parties.
- **x. Non-Public Officials:** anyone other than covered under the definition of Public Officials.

4. Policy Standards – Public & Non-Public Officials

4.1. Anti-Bribery & Anti-Corruption

i. Engage in bribery and corruption.
ii. Offer any payment, gift, hospitality, or favoritism, including making facilitation payments, expecting or rewarding business advantages or services.
iii. Accept or solicit any payment, advantage, gratification, gift, or hospitality with the intent of gaining a business advantage.
iv. Any activity that might breach this policy

4.2. Gifts, Hospitality, Entertainment & Charitable donations

i. Gifts, hospitality, or entertainment offered with the intent of gaining favors or advantages for the Group.
ii. Exchange of modest / reasonable gifts or souvenirs or extending hospitability, are permitted, if they are not extravagant or in the form of cash or equivalents and it complies with this Policy, Expenses Policy, Code of Conduct.
iii. Any such offers or receipts must be promptly reported to the Chief Human Resources Officer (CHRO).
iv. The Group Companies may make legal and ethical charitable donations subject to adherence to the legal and ethical standards, supporting genuine causes without being used as a means of bribery and corruption.

5. Risk Assessment

The Company shall implement an anti-bribery and anti-corruption risk assessment framework. The Company will create suitable monitoring and testing programmes and report to the ACB.

6. Reporting of Gifts & non-compliance with the Policy

Any concerns or non-compliance to the above Policies should be reported to *whistle.blower@smfgindia.com*.

7. Training

The Group shall provide appropriate training to its employees in these aspects and shall host the Policy on the Company's website

8. Review of Policy

The Policy shall be reviewed annually. The Group Companies shall have process manuals in this regard, which shall be read in conjunction with the Policy