



# Anti-Bribery and Anti-Corruption (ABAC) Policy

Aditya Birla Capital Limited

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## Company overview

Aditya Birla Capital Limited ('ABCL'), is one of India's leading financial services conglomerates, offering comprehensive financial solutions to meet its customers' requirements over their lifetime. From investing, to financing, protecting and advising, it provides customers a simple, secure and seamless experience through one brand and one service platform.

ABCL strives to be a leader and role model in a broad based and integrated financial services business, a good employer and a responsible corporate citizen. The Company is committed to conducting business in a transparent and fair manner while creating a positive impact on the society.

## Anti-corruption and bribery policy

ABCL's Anti-Corruption and Anti-Bribery Policy outlines the Company's zero-tolerance approach towards bribery and corruption. The objective of our anti-corruption and bribery policy is to put appropriate anti-corruption and bribery guidelines in place across all our operations globally and thus ensure zero violation of relevant laws and regulations.

## Policy Requirements

### **Bribes, Kickbacks, and Other Payments**

ABCL's anti-bribery laws cover each of its employees or associates working on behalf of the company. The company's business decisions must not be influenced by corrupt practices. Corruption may refer to any act of payments or exchange of goods of any value and includes activities such as bribery and exchange of kickbacks.

ABCL strictly prohibits any act of offer, promise, grant, authorization, demand, or acceptance of any promise, bribe, kickback, illegal gratuity, illegal payment, or other illegal goods and services of any value directly or indirectly, to or from any person, organization, or government representative.

Our anti-bribery and anti-corruption policy extends to all third parties, working for the Company, its subsidiaries and associates. Third parties acting on behalf of ABCL are prohibited from offering or accepting any bribe on the Company's behalf. Third parties include but are not limited to consultants, subcontractors, franchisees, sales agents, resellers, customs brokers, accounting or law firms, etc.

### **Political Contributions**

ABCL, its subsidiaries or associates do not directly or indirectly contribute, make payments or provide property or services, to any candidates running for public office or to political parties except pursuant to an approved policy in compliance with applicable laws. Any ABCL employee who wishes to make a political contribution in his or her personal capacity, must ensure that he or she does not imply it to be a contribution made on behalf of the Company. Company contributions to charitable organizations will be approved and authorized in accordance with the Company's policies and systems of authority and as required under applicable laws.

### **Gifts and Entertainment**

Prohibited from providing gift or entertainment to customers, prospects, government officials or their family members when such expenses are not incurred while conducting company business and / or do not satisfy the guidelines enumerated in this policy and other related policies.

**Raising a Concern**

Everyone to whom this policy applies is encouraged to report any concerns regarding bribery or suspected misconduct as soon as possible. If any stakeholder believes or suspects that a designated person, or anyone acting on behalf of the company, has engaged in behavior that violates the Company's Anti-Bribery and Anti-Corruption (ABAC) policy or relevant anti-bribery laws, they should report the issue to the designated officer. The reporting and investigation of ABAC-related cases will be conducted according to the rules established by the company. Reporting can be done on [abc.secretarial@adityabirlacapital.com](mailto:abc.secretarial@adityabirlacapital.com).

**Disciplinary Action**

Failure to comply with the terms of this Policy will not be tolerated and may result in disciplinary action, including and up to, termination of employment or agreement.

This policy has to be read along with the Company's Code of Conduct that covers all employees as applicable.

Each ABCL branch/HQ/Office endeavours business unit, and office shall implement this policy. This policy shall be reviewed periodically for its suitability and updated as necessary.