

Abridged Anti-Bribery & Anti-Corruption Policy

Trust is the essence of the relationship between the Bank and the customer, and any sort of bribery and/or corruption leads to the dilution of the trust. The bribery and/or corruption also increases uncertainty in business and can have grave reputational and financial consequences. The instances of bribery and/or corruption may expose the Bank to reputational as well as legal risk. The Bank has zero tolerance towards all forms of bribery and/or corruption and it has resolved to initiate proactive measures to mitigate such risks including formulation of this policy.

What is Not Acceptable

It is not acceptable from any employee of the Bank or person related to an employee as friend or family member, acting on behalf of such employee, to:

- a) Indulge in acts or conduct that constitutes bribery and/or corruption as defined herein above. Acts and conduct constituting bribery and/or corruption shall not be limited to relationship with existing customers and third parties of the Bank but also prospective customers, third parties and other unrelated entities having prospects of future business relationship with the Bank.
- b) Offer any payment, gift, hospitality, gratification or favouritism to any person, public official or person associated with public official having or purporting to have a business relation with the Bank or with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given to facilitate or expedite a routine procedure or dispensation of service.
- c) Accept or solicit any payment, advantage, gratification, gift or hospitality from a customer or third party that the employee knows or suspects of being offered with the expectation that it will obtain a business advantage for him/her.
- d) Threaten or retaliate against another employee who has refused to indulge in acts or conduct that constitutes bribery and/or corruption or who has adopted Whistle Blower mechanism of the Bank to raise a concern.
- e) Engage in any activity that might lead to a breach of this policy.
- f) Where acts and conduct stated in clause 2 (a) to (d) above are indulged in by a person acting on behalf of an employee for the benefit of

the employee or any other person in whom the employee is interested, the employee shall be deemed to have indulged in such acts and conduct.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this policy.

Roles & Responsibilities of Employees

- All employees must ensure that they read, understand, and comply with this policy.
- All employees are responsible for complying with this policy, any corresponding rules & procedures and all applicable anti-corruption laws while performing their duties.
- The prevention, detection and reporting of acts and conduct constituting bribery and/or corruption shall be the responsibility of all employees.
- Employees are required to avoid any activity that might lead to or suggest a breach of this policy.
- Employees should raise concerns through the Whistle Blower mechanism as soon as possible if they believe or suspect that a breach of or conflict with this policy has occurred or may occur in the future. The concerns regarding bribery and/or corruption can also be raised under the Public Interest Disclosure and Protection of Informer (PIDPI) Resolution.

Anti-Bribery & Anti-Corruption Standards

i) Interaction with Customers

Where an employee is responsible for dealing with customers, it is not acceptable from him/her (or someone on his/her behalf) to accept, give, promise to give or offer any payment, gift, hospitality, gratification or advantage with the expectation or hope that a business advantage will be given or received or to reward for a business advantage already given. The Bank prohibits all its employees from indulging in such practices.

ii) Dealing with Public Officials

Employees required to deal with public officials or persons associated with public officials have higher obligation to ensure compliance of the principles enumerated in this policy.

iii) Political Contributions

- The Bank is apolitical and does not contribute financial or other support to political parties and politicians.
- No employee should make any political contributions on behalf of the Bank, use any of Bank's resources to assist a candidate or any political party or elected official in any campaign or coerce or direct another employee to vote in a certain way.

iv) Facilitation Payments

- Facilitation payments, in whatever form, irrespective of amount are prohibited by the Bank.
- The Bank does not tolerate its employees or third parties, in their relationship with the Bank, offering, promising, soliciting, demanding, giving or accepting any kind of facilitation payments to or from any third party.

v) Charity, Sponsorship, Donations

- The Bank is committed to be a responsible member of communities where it operates, to support those in need which may include sponsoring various events, initiatives, and organisations.
- In no case, charitable contributions, sponsorships, or donations can be used as a subterfuge for bribery. All charity, sponsorship or donation activities are to be done in good faith and should not be aimed to gain any business or other advantage quid pro quo that may be considered improper.

vi) Human Resources Related Activities

- Human Resources (HR) activities such as offering employment, promotions, transfers, postings, trainings, and internship are often deemed to be something of value and therefore giving, offering, promising the same in order to obtain or retain an undue advantage is considered as bribery and/or corruption.
- The Bank does not support any unethical HR activity violating the principles of objectivity, competence, professionalism, and equal opportunities, irrespective of it covered under the definition of bribery and/or corruption or not.

➤ In order to avoid the risk of being perceived as bribery and/or corruption, all HR practices, including but not limited to, offers of employment (both full time and part time), promotions or transfers to another position, providing training or development opportunities, offers of internship (both paid and unpaid) should be only through merit-based and competitive process, wherever applicable.

vii) Third Party Compliance Expectation

In the course of its business activities, the Bank engages with a large number of third parties and such relationships have potential to expose the Bank to risk of being involved or perceived to be involved in bribery and/or corruption. In order to effectively mitigate such risk, the Bank expects all its third parties to refrain from activities constituting bribery and/or corruption. Any such act of the third party not related with the Bank, will not fall under the purview of this policy.

Breach of the Policy

Compliance with the Anti-Bribery & Anti-Corruption Policy is a key requirement for all the employees along with adherence to other applicable laws, regulations, and processes. Any breach of the policy will be subject to disciplinary or corrective action in terms of the applicable service rules or contract terms.
