

## **Anti-Bribery and Anti-Corruption Policy**

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## 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. Though currently this applies only to public servants and government employees, it is indicated that this may be extended to all citizens of the country. This policy defines the Anti-Bribery and Anti-Corruption regulations applicable to all employees.

Fullerton India Home Finance Company Limited (hereinafter referred to as “Company”) has already put in place a Code of Conduct Policy and a periodic training program to reiterate the Code of Conduct.. This policy lays down the ethical and fair business practices that the Company prescribes to itself and to its employees. These policies, inter alia, cover the anti-corruption code related to the passive corruption of employees receiving bribe.

The Company’s Anti-Bribery and Anti-Corruption Policy will supplement these policies to define the regulations preventing active bribery and corruption, that is, offering of bribe and misuse of entrusted power to enhance own/Fullerton’s performance or private gain.

## Policy Scope, Applicability and Exception

This policy is applicable to all employees employed either full-time or contractually (permanent, probationary, temporary, contractual outsources resourced) with the Company. The adherence to this policy, prevention, detection and reporting of any act of bribery and corruption is the responsibility of all employees of the Company.

## Definitions

1. **Associated Person:** means, in relation to the Company, its affiliates and the officers, employees and agents of the Company or any of its affiliates, and any contractor/subcontractor or other person who performs services for or on behalf of the Company or any of its affiliates.
2. **Bribery:** This is defined as the 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.  
The Bribery Act 2010 of UK, defines bribery as “giving someone a financial or other advantage to encourage that person to perform their functions or activities improperly or to reward that person for having already done so. So this could cover seeking to influence a decision-maker by giving some kind of extra benefit to that decision maker rather than by what can legitimately be offered”
3. **Corruption:** This is the misuse of entrusted power for private gain.

## Policy Principles

### 1. Procedure for observing the terms of the policy

The Company and its Associated Persons must not:

- i. Engage in any activity, practice or conduct which contemplates an offer, promise, give, accept or solicit Bribe in any form, monetary or non-monetary, tangible or intangible, directly or indirectly to any person including public officials during the course of one’s official duties, with the intention of influencing the decision or prevent exercise of judgment in a fair and unbiased manner.
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- ii. Offer or accept any payments other than that stipulated in the contract to take undue advantage with respect to a business process.
- iii. Be involved in any arrangement which may lead to tax evasion.
- iv. Solicit business by offering bribe or making unofficial payments to customers or potential customers.
- v. Make donations or charitable contributions with the purpose of obtaining or retaining business or any advantage for the benefit of the Company.
- vi. Accept, receive or agree to receive a bribe or benefit in any form monetary or non-monetary, tangible or intangible directly or indirectly from customers, vendors or any entity or person with whom the Company has a business relationship.
- vii. Give or receive financial or non-financial gifts that are not consistent with the guidelines listed in the Company Code of Conduct. As defined in the Company Code of Conduct policy, gifts above Rs. 1000 should not be accepted and receipt must be declared. Other details are defined in the Company Code of Conduct.
- viii. Make decisions related to appointment of Third-party vendors with bias or promise of personal gain.
  - ix. Fail to prevent/ report instances of bribery.
  - x. Fail to declare existing relatives i.e. spouse, children, parents, siblings and extended family members currently working with the organization at the time of hiring as defined in the Company Code of Conduct policy.
  - xi. Incur any unacceptable or unapproved expense when arranging any staff welfare activity.

## **2. Awareness and Training**

Company will provide periodic training and communication to its employees and procure the same for other Associated Persons to generate and maintain awareness in line with the Policy.

## **3. Risk Assessment**

The Company shall implement an anti-bribery and corruption risk assessment pursuant to this Policy.

## **4. Breach of Policy**

Any breach or violations to the policy noticed or reported will be dealt as defined in the Company Code of Conduct and the Company Disciplinary Action Policy.

## **5. Reporting**

Any suspicious incident or event may be reported to the appropriate committee as defined in the Company Whistle Blower Policy.

## **6. References**

- Code of Conduct Policy
  - Disciplinary Action Policy
  - Whistle Blower Policy
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