

APTUS VALUE HOUSING FINANCE INDIA LIMITED

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. PREAMBLE:

Aptus Value Housing Finance India Limited (“**The Company**”) is committed to uphold the core values of integrity, passion, responsibility, quality and respect in dealing with all stakeholders of the Company. To achieve the highest standard of ethics and integrity, the company has adopted this policy, thereby ensuring zero tolerance approach towards bribery and corruption.

This policy has been developed in alignment with the Company’s code of conduct for employees, various policies (including whistle blower policy), rules and regulations adopted by the company.

2. OBJECTIVES:

The key objectives of this policy are as under:

- a) Provide information and guidance on how to recognise and deal with bribery and corruption issues,
- b) Dealing with bribery and corruption issues
- c) Placing adequate procedures in place to address those risks and
- d) Procedure to report concerns/complaints relating to bribery and corruption.

3. DEFINITIONS:

- a) “**Bribery/Bribe**” means the offering, promising, giving, receiving, soliciting or accepting of a financial or other advantage, or any other thing of value, with the intention of influencing or rewarding the behaviour of a person in a position of trust to perform a public, commercial or legal function to obtain or retain a commercial advantage. It also includes accepting such advantage or value for himself or for any other person.
- b) “**Corruption**” means dishonest or fraudulent conduct by those in power and it typically involves bribery. It is abuse of entrusted power by those in occupying a position, for private gain.
- c) “**Complainant**” under this policy means any individual or group of individuals who makes a complaint on corruption/bribery or has reasonable knowledge of such bribery/corruption has taken place.

4. APPLICABILITY:

This policy is applicable to all the employees (including full-time, part-time, temporary, permanent, apprentices, trainees, etc.,) of the company or its subsidiary in head office and branch offices working at all levels and grades including directors, and any other person directly associated with the Company.

Further, this policy is per se applicable in all dealings/transactions entered by company with all the clients, investors/shareholders, associates, business partners and suppliers (“stakeholders”).

5. PROHIBITIONS UNDER THIS POLICY:

- a) This policy strictly prohibits accepting/allowing/paying of bribes/corruption either directly or through any other party in every circumstances.
- b) The Company requests adherence to compliance of this policy from all the stakeholders to achieve our purpose of this policy.

6. REPORTING OF COMPLAINTS/CONCERN:

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken directly to head.

Complaints or concerns on demand or request for bribery/corruption or suspicion of non-compliance with this Policy shall be promptly reported to the management via whistle blower mechanism (for more information please see [Whistle blower policy and vigil mechanism.](#))

The company on receipt of such complaint will investigate all allegations relating to corruption and Bribery and take legal or disciplinary action as may be deemed appropriate. All reports under this Policy would receive confidential treatment. Company has its own system of investigating its staff members for violation of service conduct including financial irregularities, corruption, fraud or embezzlement

7. PROTECTION TO COMPLAINANT:

The company will endeavour to take every step to protect the identity of any person who reports a suspected violation. No unfair treatment will be meted out to a complainant by virtue of his/her having reported a protected disclosure under this Policy.

8. AMENDMENT:

The Company reserves its right to amend or modify this policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the employees unless the same is notified to the employees in an appropriate manner.
