




Anti-Bribery and Anti-Corruption Policy
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Version History

Version	Date	Author(s)	Reviewer	Summary of Changes
1.0	22-Mar-2024			First approved version of the policy

Approval History:

Role	Sign off date	Signature
Chief Risk Officer	22-Mar-2024	

Statement of Confidentiality

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SATIN CREDITCARE NETWORK LIMITED

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Satin Creditcare Network Limited (**SCNL**) recognizes and follows all applicable laws and regulations and respects the lawful customs of the regions where we operate and transact. In India, under the provisions of the Prevention of Corruption Act, 1988 (PCA), acceptance or attempted acceptance of any form of illegal gratification (i.e., anything of value other than a legal entitlement) by a public servant is a punishable offense. Companies Act, 2013 also has provisions to prevent corruption in the corporate sector.

In addition to the Prevention of Corruption Act, 1988, the Indian Penal Code, 1860 ("IPC"), the Prevention of Money Laundering, 2002, the Central Vigilance Commission Act, 2003, Lok Ayukta Acts of various states shall also apply to offenses relating to or resulting in corruption and bribery and resolutions available.

In conformity with that, we are committed to acting and building relationships based on integrity and fairness in all our dealings. Hence, SCNL has adopted a "Zero Tolerance" approach to bribery and corruption. Our Code of Conduct also articulates this intent in clear and express terms.

1. Scope & Applicability

This policy shall be applicable and binding on all employees, or any other person associated with SCNL (hereinafter referred as "SCNL" or "Company" and for the purposes of this document includes all employees and associates with subsidiaries and affiliate companies) and such other persons, including those acting on behalf of our Company, including directors, who in turn shall ensure that financial consultants, insurance intermediaries (corporate agents, brokers etc.), distributors, vendors, consultants, advisors, suppliers, contractors or other third parties engaged with SCNL are aware of and adhere to these standards, across all locations.

The purpose of the policy is to safeguard and promote legitimate business throughout the organization and to prevent and prohibit corruption, bribery and similar acts in connection with the organization. SCNL will communicate the policy and practical procedures and its approach for the implementation of the policy to its employees and will publish this policy on its corporate website. Every employee is bound to comply with the anti-bribery and anti-corruption policy, as part of the Code of Conduct.

2. Anti-Bribery & Corruption

Under no circumstances, any employee may offer, promise, or grant anything of value (Say above Rs 5000) to

- a. Government Official
- b. Any person, or members of their family
- c. A third party
- d. Charitable organization suggested by such a recipient
- e. Policyholders and prospective customers in the form of rebate or any other inducement;
- f. Or any other entity and/or individual, directly or indirectly related and having a conflict of interest with the employee.

For influencing the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with SCNL.

3. Accepting Gifts and Entertainment

In general, employees may not accept gifts or the conveyance of anything of value (including entertainment) from current or prospective clients of the company and its financial consultants or agents, partners, vendors, any other entity, any other entity or individual, directly or indirectly related and having a conflict of interest with the employee.



Employees may never accept a gift under circumstances in which it could even appear to others that the business judgment may be compromised. Similarly, employees may not accept or allow a close family member to accept gifts, services, loans or preferential treatment from clients, agents or others in exchange for a past, current or future business relationship with the company.

Cash gifts or their equivalent (e.g., gift cards or vouchers) may not be accepted under any circumstances. Non-cash gifts may be accepted when permitted under applicable law if they are:

- a. Nominal in value (e.g. diaries, planners and similar stationery, inexpensive food items or any other items up to a maximum of approx. INR 5000)
- b. Appropriate, customary and reasonable meals and entertainment at which the giver is present, such as an occasional business meal or sporting event; or
- c. Appropriate, customary and reasonable gifts based on family or personal relationships, and clearly not meant to influence company's business. If employees have any questions about the appropriateness of accepting a gift, invitation, raffle or other prize, employee should disclose and discuss the matter with their manager prior to participation or acceptance.

4. Giving Gifts and Providing Entertainment

In certain circumstances, giving gifts and providing entertainment may be seen as a conflict of interest by others, or in extreme cases, bribery. Appropriate gifts and entertainment may be offered to clients, by the person authorized to do so, subject to the procedures applicable for the company.

5. Responsibility

As a part of engagement with SCNL and as an ethical responsibility, all the stakeholders such as Board of Directors, senior management, managers and all other employees shall be responsible for the enforcement of and compliance with this policy on business conduct to ensure awareness and compliance.

Employees need to be alert about possible violations of this policy and must report them through the given channels for complaint. Employees must cooperate in any internal or external investigations of possible violations. If one is asked to make a payment on the Company's behalf, one should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. One should always ask for a receipt, which details the reason of the payment. If one has any suspicions, concerns or queries regarding a payment, one should raise these prior to taking any action.

6. Breach

Violation of any of the orders, laws, rules and regulations under this policy may subject the employee to criminal or civil liability, including potential prosecution, fines and other penalties for improper conduct, as well as imprisonment or may result in corrective/ disciplinary action by SCNL, including termination from the employment.

Red Flags Following is a list of "red flags" that may indicate the possible existence of corrupt practices and should be kept in mind by those subject to this Policy:

- a. Use of an agent with a poor reputation or with links to the government
- b. Unusually large commission payments or commission payments where the agent does not appear to have provided significant service
- c. Cash payments, or payments made without a paper trail or without compliance with normal internal controls
- d. Payments to be made through third-party countries or to offshore accounts



- e. Private meetings requested by public contractors or companies hoping to tender for contracts
- f. Unexplained preferences for certain sub-contractors
- g. Invoices rendered or paid in excess of contractual amounts

This list is not exhaustive and one should be alert to other indicators that may raise a suspicion of corrupt activity.

7. Review

The Risk Management Committee of the Board (hereinafter referred as "RMC" or "RMCB" or "Committee") reserves the right to amend or modify this policy in completely or in part, annually or at any time without assigning any reason, whatsoever.

8. Compliance

The compliance of this Policy shall be presented to the Audit Committee where the HR Department shall raise all reports, complaints, doubts, or concerns about this policy to the committee.

9. Investigation

Every query or concern raised by any person/s or source mentioned above about any suspected violation of this policy shall be investigated with the approval of **two levels higher than the position/s involved**.

The approving authority has the right to close the case on non-receipt of the material evidence or required information. Any representation concerning the lowering of action taken for a bribery/corruption case shall be made through the respective executive committee (EXCOM) members to CMD.

10. Bribery/Corruption complaint against any Key Management Personnel (KMP) and / or Executive Committee (EXCOM)

In continuation with clause 9 above, in case a complaint is received against any Senior Management personnel and/or member of the executive committee, the HR Department would forward the matter to the CMD within 2 days of the receipt of the complaint. Based on the gravity of the case, the CMD may decide to advise the future course of investigation, as mentioned below:

- a) In case the complaint is of a ***serious nature**, as interpreted by the HR Department/CMD:
 - The Investigator will be required to keep the HR Department/CMD informed about the same.
 - The Investigator may, in consultation with the CMD decide to appoint a third-party investigator and/or a law firm and/or expert, to investigate the case. The lead investigator in such cases will be appointed by the CMD, as felt appropriate.
 - Matters if any, related to the management of the external stakeholders including the media, regulator, etc. would be decided by the CMD.

***Note:** A complaint of a serious nature would mean any complaint that may involve serious questions related to the governance standards adopted by the organization and/or matters that may pose significant operational/financial/reputation risk or loss to the organization or reputation risk to 'SCNL' brand and/or as interpreted by the HR Department/CMD.

- b) In all other cases, the investigation is as per the usual defined process. In such cases, the lead investigator will be appointed by the **two levels higher than the position/s involved**, as deemed fit.



The appointee may seek the CMD's suggestion regarding the investigation.

11. Channel for complaint

Complaints can be made by any employee or any other person associated with our Company and such other persons, including those acting on behalf of our Company and including directors, financial consultants, corporate agents, brokers, distributors, vendors, consultants, advisors, suppliers, contractors or other third parties.

The complainant may send a communication through email or directly in writing through a letter to,

The HR Department
Satin Creditcare Network Limited
Plot No – 492, Udyog Vihar, Phase- III,
Gurugram, Haryana – 122016

Or

whistleblower@satincreditcare.com



