



ANTI-BRIBERY and ANTI-CORRUPTION POLICY

BAJAJ HOUSING FINANCE LIMITED

A. Introduction

Bajaj Housing Finance Limited ('**BHFL**'/ '**the Company**') conduct its business in a lawful and ethical manner and expect its employees, stakeholders and third parties associated with it to conduct its business with integrity.

The Anti-Bribery and Anti-Corruption Policy ('**ABAC Policy**') of BHFL is in furtherance to Code of Ethics and Personal Conduct ('**CoEPC**') for employees, stakeholders and third parties and in conformance with the legal and statutory framework of anti-corruption legislation prevalent in India. The Policy reflects the commitment of BHFL and its management for maintaining highest ethical standards while undertaking open and fair business culture, following the best practices of Corporate Governance, and enhancing the BHFL's reputation at all levels.

B. Object of Policy

The objective of this Policy is to ensure that neither:

- (a) BHFL nor any of its employees (whether full-time or contractual employees and including trainees and interns), directors (*collectively referred to as '**Employees**'*),
- (b) Agents, associates, vendors, consultants, advisors, representatives, or intermediaries (*collectively referred to as '**Persons/Third parties**'*),
- (c) Customers, Investors, Lenders, Government (including Government officials), Shareholders, Regulators, and the Society (*collectively referred to as '**Stakeholders**'*),

indulge in any acts of 'Bribery' or 'Corruption' in discharge of their official duties towards the BHFL, either in their own name or in the name of the BHFL.

C. Scope

This Policy applies to all Employees, Stakeholders, and any Persons/Third parties associated with the BHFL and/or who may be transacting with BHFL and/or on behalf of the BHFL. This Policy sets out the minimum standard that must be followed at all times.

D. Policy Endorsement

The policy is endorsed by Legal and HR functions and approved by the ESG Committee of BHFL.

E. Important Definitions

'Bribery' refers to solicitation or receipt of any undue personal favor or advantage for official action and includes receiving a 'Bribe' and/or a third-party gratification, in the form of reward, gift or favor bestowed or promised whether monetary or otherwise, with a view to influence the action of a person.

'Charitable Contribution' refers to financial support or goods and services donated to non-profit organizations, in the form of cash contribution, or 'in kind'. Such charitable contributions are not dependent on, nor made to secure, a business deal.

'Corruption' refers to the abuse of entrusted power for receiving a personal gain, whether monetary or otherwise and includes 'Bribery' as a form of Corruption and is a

punishable offence under the provisions of Prevention of Corruption Act, 1988 read together with any amendments thereto ('**Act**').

'Facilitation Payments' refers to unofficial payments made to secure or expedite a routine government action by a Public Servant (which shall have the same meaning as set out in the Act). These include payments made, directly or indirectly, to Public Servants for the purpose of expediting or securing routine, non-discretionary government action, such as securing a business permit or license, customs invoice, or visa, or providing services like police protection.

'Gifts' refers to and includes tendering to a recipient, products, services, cash, or cash equivalents (e.g., cheques, traveller's cheques, gift cards, gift certificates, vouchers, loans and shares) and all business courtesies, gratuities, discounts, favors and other things of value for which the recipient does not pay the fair market value.

F. Employees' Responsibilities:

The BHFL prohibits corruption and bribery in any form to or from any person. Compliance with provisions of ABAC policy is expected from all the employees of BHFL as under:

- **Policy Compliance:** Employees should read and understand the ABAC Policy and must ensure compliance with the terms and conditions mentioned in the Policy.
- **Training:** Employees should participate in and complete the annual training on anti-bribery and associated aspects provided by the BHFL as part of CoEPC.
- **Due Diligence:** Employees should ensure proper due diligence of the Persons/Third Parties before onboarding.
- **Integrity:** Employees should not offer or give to any Persons/Third Parties or accept from any Persons/Third Parties any bribes, facilitation payments, or any other improper benefits.
- **Conflict of Interest:** Employees should refrain from hiring one's own firm(s) or firm(s) belonging to close relatives for supply of goods or services to BHFL. Close Relatives as defined in CoEPC, shall mean and include spouse, Father, Stepfather, Mother, Stepmother, Son, Stepson, Son's wife, Daughter, Stepdaughter, Daughter's husband, Brother, Stepbrother, Sister, Stepsister. The officials entrusted to identify/empanel any vendor(s)/firm(s) for the supply of goods and services to BHFL, should perform their duties on an arm's length basis and adhere to the comprehensive guidelines on avoiding conflict of interest stated in the CoEPC.
- **Gifts:** Employees shall not accept any gifts, hospitality, and/or related expenses from any person, which may lead to conflict of interest with the business of BHFL. As per the CoEPC, only gifts of small or nominal value – up to Rs. 3500 in kind per entity per employee – may be accepted or given. Any exceptions shall be governed as per the CoEPC.

- **Charitable Contributions and Sponsorships:**

1. **BHFL's Contribution:** Charitable contributions by BHFL (money, goods, or services) must:
 - (a) Be made to a legitimate, bona fide organization for charitable causes.
 - (b) Be permitted under all applicable laws and regulations.
2. **Employees' Contribution:** Properly documented personal donations made by the employees of BHFL are allowed provided such donations should not interfere or in any way conflict with the official work of the employee or with the business of BHFL in any manner.

- **Political Contributions and Sponsorships:** Employees should not make any political contributions on behalf of BHFL to any Political party and should not misrepresent or imply that contributions have been made on behalf of BHFL.

- **Dealing with Government, Legislative Officials and Political Parties:**

1. Any direct/indirect valuable product/service/kind offering to Public Servant in form of Bribe or Corruption while dealing on behalf of BHFL is prohibited.
2. Any favour from political parties or any association with political parties is prohibited.
3. In case any employee proposes to represent BHFL while dealing with political parties, the same shall be done by or under the instructions of personnel authorized by the Managing Director as set out in the CoEPC.
4. In case any government tenders, appropriate procedures shall be followed which ensure independence, fairness, and transparency during the whole tender process cycle. No favour shall be taken from government officials while bidding or allocation of tenders.

- **Use of Trademark:** BHFL employees should not use BHFL's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of BHFL.

- **Exception:** Any exception to this Policy should be carefully evaluated before its rejection or approval by the respective Business unit head and Head human resources.

- **Whistle Blower Mechanism:** Immediately report any violation of BHFL's ABAC policy to whistleblower email id bhfl_whistleblower@bajajhousing.co.in. Appropriate action shall be taken as per the Board approved Whistle Blower Policy. In certain cases, violations may come to light through employee declarations made after the incident has occurred, or the company may independently discover such instances. All such cases shall fall under the purview of Board approved Whistle Blower Policy. To know more details and about the manner of reporting, the whistle blower policy could be accessed under Legal section of Company's website www.bajajhousingfinance.in.

G. Third Parties' / Stakeholders' Responsibilities:

The BHFL prohibits Corruption and Bribery in any form to or from any person. Compliance with provisions of ABAC policy is expected from all the Persons/Third parties and/or any Stakeholders associated with BHFL as under:

- Not offer any Gifts and shall not provide any hospitality or its related expenses to the employees of BHFL.
- Strictly adhere to BHFL's CoEPC which also details about anti-Bribery, Gifts, hospitality & expenses.
- Strictly adhere to the terms of this policy and Suppliers' Code of Conduct while carrying on their assignments with BHFL.
- Necessarily allow BHFL to inspect the books of accounts and other documents of all Persons/Third parties and/or Stakeholders associated, as part of any investigation in alleged/identified case(s) of Corruption/Bribery.
- **Whistle Blower Mechanism:** Immediately report any violation of BHFL's ABAC policy to whistleblower email id bhfl_whistleblower@bajajhousing.co.in. Appropriate action shall be taken as per the Board approved Whistle Blower Policy. In certain cases, violations may come to light through employee declarations made after the incident has occurred, or the company may independently discover such instances. All such cases shall fall under the purview of Board approved Whistle Blower Policy. To know more details and about the manner of reporting, the whistle blower policy could be accessed on website www.bajajhousingfinance.in .

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