



CREDITACCESS GRAMEEN LIMITED

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Revision History

Version	Author	Description of Changes	Release Date
1	Chief Compliance Officer	First version	August 11, 2021
2	Chief Compliance Officer	Under the definition of corruption, in addition to "Bribery" below practices have also been included – Fraud, Extortion, Collusion, and Money Laundering	March 23, 2022
3	Head – Investor Relations	Re-adoption	April 01, 2024
4	Chief Compliance Officer	Addition of 'Sextortion' under 'Bribery' and quantifying the value of modest gift	May 16, 2025
5	Head - HR	Expanded definitions (with sextortion), gift thresholds defined, controls for third-party engagements, procurement and governance mechanisms.	October 22, 2026

Version Control

Version	Author	Reviewed by	Approved by
1	Chief Compliance Officer	MD & CEO	Board of Directors
2	Chief Compliance Officer	MD & CEO	Board of Directors
3	Head – Investor Relations	Managing Director	Board of Directors
4	Chief Compliance Officer	CEO & MD	Board of Directors
5	Head - HR	Chief Operating Officer Chief Compliance Officer Managing Director & CEO	Board of Directors

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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Policy Statement and Purpose

- a. CreditAccess Grameen Limited, ("**Company**"), is committed to conducting its business with integrity, fairness, and professionalism across all operations. The Company shall comply with all applicable laws and maintain effective systems to prevent, detect, and deter bribery and corruption, including prohibiting improper payments, gifts, or inducements to or from any person, whether in the public or private sector.
- b. Bribery and corruption may take various forms, including cash payments, gift vouchers, gift cards, prepaid cards or cryptocurrency/virtual currency gifts to individuals or their associates, inflated commissions, non-genuine consultancy or advisory arrangements, unauthorized rebates, non-monetary favors, or misuse of charitable or political contributions. Such conduct may occur directly or through third parties.

The purpose of this Anti-Bribery & Anti-Corruption Policy ("Policy") is to comply with **Prevention of Corruption Act, Companies Act, RBI guidelines, and other applicable anti-corruption laws** and prevent the Company's involvement in any such activities, whether direct or indirect, by establishing adequate procedures and requiring employees, directors, officers, and associated third parties to identify, report, and appropriately address any questionable transactions or conduct. This Policy strictly prohibits the offer, promise, giving, solicitation, or acceptance of any undue advantage, whether undertaken directly by the Company or its Employees, or indirectly through third parties acting on the Company's behalf.

- c. Employees shall remain vigilant to indicative questionable transactions or situations, including the following:
 - i. The contract requires use of a third-party consultants whose principals or owners are government officials.
 - ii. The business partner lacks qualifications, experience or capability to perform the proposed services
 - iii. Any potential partner who provides guarantees of success or claims to have the ability to obtain licenses or other government approval without providing a description of a legitimate manner by which those goals will be accomplished.
 - iv. Transactions involving unusual payment patterns or financial arrangements, including requests to pay commissions is a warning sign. A request to deposit payments in multiple bank accounts, perhaps in offshore banks, also requires additional scrutiny.
 - v. A counterparty refuses to accept anti-bribery and anti-money laundering clause in the proposed contract.
 - vi. Based on pre-acquisition / counterparty due diligence, it becomes apparent that the counterparty has a reputation for offering bribes or violating other laws or indulging in unusual, suspicious transactions.
 - vii. Inflated payouts too, or questionable role of counterparty or its affiliate.
 - viii. Counterparty resists or fails to provide details of parentage or has undisclosed

principals, associates or subcontractors with whom it splits fees.

- ix. Counterparty refuses access to its books and records were requested under the proposed contract.

d. Anti-Bribery & Anti- Corruption Standards:

The Company adopts a “Zero-Tolerance” approach to bribery and corruption. Accordingly, the Company, its Employees and associated persons shall not:

- i. Engage in any act or conduct that constitute bribery / corruption in dealings with customers, prospective customers, vendors, insurance agents, insurance intermediary and any entities having existing or future business relationship with the Company.
- ii. Offer, promise, give, request, or accept any undue advantage, directly or indirectly, to or from any person, including public officials, to obtain, retain, or reward a business or regulatory advantage, or to influence any routine process
- iii. Accept or solicit any payment, advantage, gratification or gift from any party in a manner intended to influence business decisions or secure an improper advantage
- iv. Threaten or retaliate against another employee for refusing to indulge in acts or conduct that constitute bribery / corruption or for reporting concerns under the Whistle Blower mechanism.
- v. Make any donations, charitable contributions, sponsorships to a public office or a public official as a subterfuge for bribery to influence, to obtain or retain business or an advantage for the benefit of the Company.
- vi. Engage in or support unethical HR practices, including offering or influencing employment, promotions, transfers, or postings, in exchange for any undue advantage.
- vii. Offer, promise, solicit, demand, give or accept any kind of facilitation payments or kickbacks to or from any third party or directly in relation to the company.

e. The guidelines in this Policy supplement the following and should be read in conjunction with:

- i. Policy on Prevention of Sexual Harassment of Women at Workplace Vigil Mechanism (Whistleblower Policy) Guidelines on Fair Practices Code for NBFC-MFIs and Ombudsman for NBFC.
- ii. Code of Conduct for employees of CA GRAMEEN.
- iii. Know Your Customer (KYC) And Anti-Money Laundering (AML) and Countering Financing of Terrorism (CFT)Policy
- iv. Policy on Management of Conflict of Interest
- v. Such other Policies / directions applicable to the Company from time to time.

2. Scope and Applicability

- a. This Policy applies to all individuals associated with the Company at all levels, including directors, senior management, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with the Company and such other persons, including those acting on behalf of our Company, irrespective of work location/ geography as designated by the Head -HR from time to time (all of the aforesaid being collectively referred to as

"Employees").

- b.** In the event of any uncertainty regarding the interpretation or applicability of this Policy, or whether any conduct may constitute a breach, Employees are required to seek guidance from HR.

3. Designated Compliance Officer (Head – HR)

- a.** The Head of HR of the company is identified as the designated compliance officer. Head- HR to ensure compliance with the provisions of this Policy and the same shall be notified to all the Employees. All reports, complaints, doubts or concerns in relation to this Policy shall be raised by the Employees to Head - HR. All queries or concerns relating to suspected violations of this Policy shall be reviewed and investigated by the Head -HR
- b.** Any action required to be undertaken under this Policy shall be taken by the Head -HR in accordance with this Policy. The Head -HR shall report aggravated cases of breach of this Policy to the Managing Director / Audit committee of the Board.

HR shall maintain the Gifts and Mementos Register based on declarations submitted by Employees in respect of gifts received and by the respective departments in respect of gifts offered on behalf of the Company. The Register shall capture relevant particulars, including the nature and value of the gift, the source or recipient, the date of receipt or offer, and the approval details, wherever relevant.

Employees shall be responsible for timely and accurate declaration of gifts received and offered in accordance with the requirements of this Policy. The respective departments shall ensure that details of gifts offered by the Company are accurately documented and provided to HR for maintaining the Register.

Investigation of suspected violations and reporting of aggravated cases of breach to the Managing Director / Audit Committee of the Board, shall be conducted by the Head-HR who shall seek input from the Chief Compliance Officer where required. Despite the foregoing, the Chief Compliance Officer shall independently supervise the implementation of this Policy and shall retain the right to report directly to the Managing Director / Audit Committee of the Board, as the Chief Compliance Officer deems fit, whether or not the matter has been raised or escalated by the Head-HR. This is consistent with RBI's Framework for Compliance Function and Role of Chief Compliance Officer in NBFCs (RBI/2022-23/24 dated April 11, 2022), which requires the Compliance Function to retain overall oversight of Compliance risk areas even where another function holds prime responsibility for day-to-day administration.

4. Definitions

a. Bribery

Bribery refers to the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value - providing lavish/inappropriate gifts, gift vouchers, gift cards, prepaid cards, cryptocurrency/virtual currency, inside information, or sexual or other favours; offering employment to a relative; underwriting

travel expenses; abuse of function; or other significant favours. Bribery includes advantages provided directly, as well as indirectly through an intermediary. This Policy prohibits the offering, giving, solicitation, or acceptance of bribes, whether involving public officials, customers, vendors, or other business counterparties.

b. Public Official (Government Official or Public Servant)

In the Indian context, a public official would include (but not be limited to) the following:

- i. any person holding a legislative, executive or administrative office of the government (domestic or foreign) or acting in the official capacity for or on behalf of a legislative, executive, or administrative office of the government (domestic or foreign), whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person's seniority.
- ii. any person in the service or pay of the government or of a corporation established by or under a central, provincial or state statute, or an authority or a body owned or controlled or aided by the government or a government company or is remunerated by the government by fees or commission for the performance of any public duty.
- iii. any judge, including any person empowered by law to discharge, whether by himself/herself or as a member of any body of persons, any adjudicatory functions.
- iv. any person authorised by a court of justice to perform any duty, in connection with the administration of justice, including a liquidator, receiver or commissioner appointed by such court.
- v. any person who performs a public duty, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the country and as applied in the pertinent area of law; and
- vi. any other person defined as a "public official" under the domestic law.

"State" means all levels and subdivisions of governments (i.e., local, regional, or national and administrative, legislative, or executive).

For the purposes of this Policy, 'Public Official' shall also include Politically Exposed Persons (PEPs), their immediate family members and close associates, officials or employees of public international organisations, employees, directors or representatives of entities owned or controlled by the government, and any person acting on behalf of or for the benefit of a public official, including candidates for public office.

c. Facilitation payment or kickbacks

"Facilitation Payments" are unofficial payments made to public officials to secure or expedite the performance/ non-performance of a routine or necessary action. They are sometimes referred to as 'speed' money or 'grease' payments or 'good-will money'. The payer of the facilitation payment usually already has legal or other entitlement to the relevant action. "Kickbacks" are typically payments made in return for a business favour or advantage. The policy

strictly prohibits facilitation payments and kickbacks in any form, whether made directly or through third parties.

d. Third party

The term “third party” includes any individual or organization, who/which engages or conducts business with the Company. It also includes actual and potential clients, vendors, consultants, retainers, agents, advisors, distributors, business associates, partners (including academic institutions), contractors, suppliers or service providers who work for and on behalf of the company.

e. Improper performance

Breach of an expectation that a person will act in good faith, impartially or in accordance with a position of trust, amounts to improper performance. This would also include obtaining, agreeing to receive, accepting, or attempting to obtain, an undue advantage in connection with the performance of such duties.

f. Corruption

Corruption includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards.

Corruption involves the misuse of position or authority to obtain an undue advantage, whether financial or otherwise, and may take various forms, including bribery, fraud, extortion, sextortion, collusion, and money laundering. Such conduct may involve monetary or non-monetary benefits intended to improperly influence decisions or actions.

Corruption risks may arise in the following areas, among others:

- A. Gifts and Mementos.
- B. Facilitation Payments.
- C. Procurement Process.
- D. Political, Community or Charitable Contributions.
- E. Performance of duties and decision-making.
- F. Recruitment, employment, and related HR practices
- G. Conflict of Interest

5. Gifts and Mementos

1. Gifts and Mementos are permitted if they are reasonable, proportionate, made in good faith and approved in accordance with this Policy. In the event of any uncertainty, employees are required to seek guidance from HR.
2. A “**Gift**” means anything of value including tangible items such as cash, precious metals, stones, jewellery, art, and intangible items such as discounts, services, loans, favours, special privileges, advantages, benefits and rights that are not available to the public and includes gift vouchers, gift cards, prepaid cards and cryptocurrency/virtual currency. Employees shall not solicit gifts from any person or company that has, or seeks to have, business relationship with the Company.

3. This Policy applies to gifts offered to Employees in their official capacity or for the benefit of any group or function within the Company. Employees shall declare to HR any gift or memento received in their official capacity where the value of an individual gift exceeds ₹5,000 or the cumulative value of gifts received from the same source exceeds ₹5,000 in a financial year. Any gift received from a public official, or any gift that is prohibited under this Policy or may give rise to an actual or perceived conflict of interest, shall be declared irrespective of its value. Such declarations shall be made within seven calendar days of receipt. Employees shall ensure that gifts are accepted only where permitted under this Policy. Declaration of a gift shall not, by itself, constitute approval for its acceptance. Acceptance of cash or cash equivalents is strictly prohibited.
4. Cash Equivalents include cheques, demand drafts, bank transfers, UPI/wallet credits, gift vouchers, gift cards, prepaid cards and cryptocurrency/virtual currency.

Employees shall not offer any gifts or benefits to public officials, except for nominal items of symbolic value (**not exceeding ₹5,000**). For customers, vendors, and other business counterparties, gifts may be offered where they are reasonable, proportionate, and in the ordinary course of business, subject to a **per-instance limit of ₹10,000**. The aggregate value of all gifts and mementos offered by the Company to any individual recipient in a financial year shall not exceed ₹25,000. The aggregate value of all gifts and mementos offered by the Company shall not exceed ₹50,00,000/- (INR Fifty Lakhs) in a financial year. All such expenses should be approved by respective CXOs with a copy to the Head HR & COO and MD & CEO.

Any gift exceeding the above limits shall require prior approval from the MD & CEO. The Employee or department offering such gift shall be responsible for obtaining this approval and for declaring the gift to HR within seven calendar days of it being offered, along with a copy of the approval, for recording in the Gifts and Mementos Register.

Employees are prohibited from offering gifts or favours that may influence, or appear to influence, business decisions, or that are not aligned with legitimate business purposes. Employees shall not solicit or accept any personal benefit that may compromise, or appear to compromise, their objectivity. The aggregate value of gifts accepted by any Employee from any single source in a financial year shall not exceed ₹10,000.

5. Gifts and Mementos may be permitted if they meet all the following conditions:
 - i. Is bona-fide and made in the normal course of business and does not create the appearance (or an implied obligation) that the parties involved are entitled to preferential treatment, an award of business, better prices, or improved terms of sales or service.
 - ii. Comply with local laws and customs (including cultural and religious festivals) and is not prohibited under applicable law.
 - iii. Would not influence, or appear to influence, or cause a conflict of interest to the parties involved
 - iv. Does not include cash or cash equivalents, gold or other precious metals, gems or stones.
 - v. Does not include any form of services or non-cash benefits including any personal or business advantage
 - vi. Disclosure of the same does not cause reputational concern to the parties involved or the company.
 - vii. Is fully documented and supported by original receipts and accurately recorded in the company's books.

- viii. Is provided transparently and in a manner that does not create any perception of impropriety.
 - ix. Gifts or mementos may be offered or accepted:
 - During recognised festivals or cultural/religious occasions (e.g. Diwali, Pongal, Ugadi, Eid, Christmas, New Year)
 - At Company events such as foundation day, branch or office openings, product launches and AGMs
 - To speakers, panellists, chief guests or participants at conferences, seminars, training sessions or CSR events
 - For business partner or customer recognition events and awards
 - For personal milestones of a business counterpart (e.g. retirement or farewell), at nominal value
 - As Company-branded promotional items (diaries, calendars, pens) of nominal value
6. No gift or memento shall be offered or accepted:
- They are intended to influence, reward or induce any business, credit, procurement, recruitment, regulatory, audit or other official decision
 - An RFP, tender, PRC evaluation, contract negotiation, vendor selection, renewal, credit decision, audit, investigation or other material decision involving the counterparty is pending, or the gift may create an actual or perceived conflict of interest
 - While a regulatory inspection, audit, license or approval involving the recipient is pending
 - They are intended to secure preferential treatment or create an obligation on the recipient
 - To or from any borrower, member or loan applicant
 - If it is solicited, or tied to any decision, favour or outcome
 - If it is given to family members or associates of the intended recipient to get around the Policy
 - If it is given in secret, or delivered to a home address to avoid disclosure
 - They are prohibited by applicable law, the recipient's applicable rules or the Company's internal policies

Any gift or memento received in excess of the prescribed limits or under circumstances prohibited by this Policy shall be politely declined or returned. Where return is impracticable, the Employee shall declare the gift to HR within seven calendar days of receipt, providing the reasons for non-return along with details of the gift, including its estimated value, source and circumstances of receipt. HR shall record the declaration in the Gifts and Mementos Register.

6. Facilitation Payments or Kickbacks

Facilitation payments are typically associated with expediting or influencing routine or administrative actions by public officials, including obtaining permits, licenses, approvals, registrations, or other regulatory clearances, processing applications or inspections, or securing access to public services, irrespective of whether such actions are linked to the initiation, continuation, or conduct of business.

Facilitation payments and kickbacks are strictly prohibited, and no such payments shall be made or accepted during the Company's business, except those payments made to protect life, health or safety (subject to declaration to Designated Compliance Officer) under exceptional circumstances.

7. Procurement Process

All Employees shall adhere to the Company's procurement processes and comply with the established internal control framework for vendor / supplier selection, including obtaining PRC approvals where required. Vendor / supplier selection shall be based on objective evaluation of multiple options and sound business considerations, and shall not be influenced by any gift and Mementos. In cases involving formal RFP/PRC processes, appropriate documentation shall be maintained to demonstrate compliance.

8. Use of Third-Party Agents, Consultants and other Intermediaries

1. The Company may be held liable for acts of bribery or corruption committed by third parties acting on its behalf, irrespective of whether such acts were expressly authorised. Accordingly, appropriate due diligence and care shall be exercised in the selection and engagement of all third parties. The determination of whether a third party is acting on behalf of the Company shall be based on the substance of the relationship and the relevant facts and circumstances, and not merely on its contractual or formal designation.
2. All dealings with suppliers, agents, contractors, service providers, intermediaries, consultants, and advisors, shall be carried out with the highest standards of integrity and in compliance with all relevant laws and regulations. Employees shall ensure that all third parties are selected and engaged in a manner consistent with the Company's standards of integrity and ethical conduct.
3. The following should be ensured while engaging a third party:
 - i. Appropriate due diligence is conducted and adequately documented.
 - ii. Formal written commitment is obtained from the third party to comply with applicable anti-bribery and anti-corruption requirements.
 - iii. Appropriate anti-bribery and anti-corruption provisions are incorporated in the contracts in consultation with the legal team, including the right to audit, and termination provisions in case of non-compliance.

Also, periodic due diligence is carried out for existing vendors as per the Board approved Vendor & Outsourcing Management Policy

9. Political and Charitable Contributions

Employees shall not make political contributions using the Company's funds, properties or other resources, except where such contributions are approved by the Board and made in compliance with applicable law. The Company may make charitable donations for humanitarian purposes, including emergency and disaster relief in accordance with the Corporate Social Responsibility Policy. Such contributions should be made without demand or expectation and shall not be made in a manner that could be construed as an inducement.

Before making such a contribution, employees should ensure that:

- i. Such charitable contributions are not dependent on, nor made to win, a business deal.

- ii. The contribution is always made directly to the registered charitable organisation and not to any individual, except where donations or grants are provided directly to victims of natural disasters, in accordance with the Company's CSR policy.
- iii. Contributions should be made to entities where the end use of the contribution is known and/or monitored.
- iv. Appropriate due diligence on charitable organizations should be carried out to ensure that the organization does not act as a conduit to fund illegal activities in violation of anti-money laundering laws, anti-terrorism laws and other applicable laws.
- v. Only such charitable contributions shall be made that are legal and ethical under local laws and practices.

10. Sponsorships

Sponsorships are closely allied to the community / business activities undertaken by the Company. These could range from educational scholarships to medical camps. Sponsorships must be for genuine business or charitable objectives without any element of quid pro quo. Sponsorships must be transparent, duly approved, documented and reported as per the Company's CSR Policy.

11. Books, Records and Internal Control Requirements

- 1. Accurate and complete record-keeping shall be always maintained to support the Company's operations and compliance with applicable legal and regulatory requirements. Employees shall ensure that all records and reports, including internal and external documents, are accurate and complete
- 2. Expenses shall not be concealed, misclassified or inaccurately recorded. Employees shall ensure that all books, records and financial reporting are accurate, complete, and maintained in accordance with applicable laws and internal policies.
- 3. All business units and entities shall maintain an effective system of internal controls and monitoring over transactions. Specific controls including those related to approval of travel expenses are set out in the Company's policies. Employees shall be familiar with such control procedures and ensure compliance. All expenses relating to gifts or charitable donations shall be submitted in accordance with applicable policies and shall clearly record the purpose of the expenditure.
- 4. Employees are required to maintain all financial records and have appropriate internal controls in place which will provide the business reason for payments involving third parties.
- 5. All accounts, invoices, memoranda and documents relating to dealings with third parties, shall be maintained with accuracy and completeness. The company's records management and retention policies ensure that records are maintained to meet our legal, tax and regulatory requirements and are securely disposed upon completion of statutory retention period. Employees shall not dispose of any information that may be relevant to current or potential litigation or subject to any legal prohibition, without prior written authorization from the relevant department.

6. Employees who identify or suspect any financial misconduct shall promptly notify their supervisors and the Head -HR.

12. Conflict of Interest

Employees must disclose any actual, potential or perceived conflict of interest involving customers, vendors, government officials, relatives, or business partners in accordance with the Company's Policy on Management of Conflict of Interest.

13. Communication and Compliance Training

1. The Company is committed to maintaining adequate procedures to address risks arising under this Policy. To support this, regular training shall be provided to relevant business units on this Policy, employee obligations, and applicable procedures and controls.
2. Anti-bribery and anti-corruption training shall be included as part of employee induction and further reinforced through Learning Management System (LMS) courses and ongoing communications.

14. How to Raise Concerns

1. Employees are encouraged to raise concerns regarding any suspected bribery, malpractice, corruption or breach of this Policy. In case of any uncertainty as to whether a particular act constitutes bribery or corruption or for any related queries, they may seek guidance from their reporting manager or HR:
2. Employees may also raise concerns under the company's 'Whistleblower Policy' which is intended to enable employees, and other stakeholders, to report serious concerns internally / write to "Vigil" <vigil@cagrameen.in>. The 'Whistleblower Policy' is made available on the Company's website.
3. No personnel who, in good faith, reports a violation of this Policy shall be subject to harassment, retaliation or any adverse employment consequences.

15. Responsibility and Penalties

1. Any violation of this Policy will be regarded as a serious breach and may result in disciplinary action, up to and including termination, in accordance with applicable law and the terms of employment.
2. Bribery is a criminal offense. Any Employee found to be in violation shall be held accountable, whether directly involved or through authorising, assisting, or conspiring in such conduct. Violations may result in individual legal consequences, including imprisonment, probation, and monetary fines, which shall not be borne by the Company.
3. In case of violations of this policy, the Head -HR, seeking inputs from the Chief Compliance Officer where required, shall take appropriate steps including:
 - i. Assigning an Investigation Team: Experts with the right knowledge and objectivity may

be appointed to investigate the complaint and confidentiality of such complaints are maintained,

- ii. Conducting an Investigation: Suspected violations shall be investigated by the Head -HR, with inputs sought from the Chief Compliance Officer where required, with the investigation team. The investigation team may seek access to records, information, and written statements relevant to the matter. Employees shall fully cooperate and promptly provide the requested information. The investigation to be completed within 90 days and report shall be treated confidential and be shared only on a "need to know" basis and preserved as evidence.
 - iii. Corrective Action: If necessary, corrective action may be prescribed or suggested to appropriate managers, officers and employees for implementation.
 - iv. Penalties: The Investigation Team shall submit its report to the Disciplinary Committee for review. The Disciplinary Committee shall evaluate the findings and recommend appropriate disciplinary action, including suspension or termination of service, based on the nature and severity of the violation. Such recommendations shall be implemented by the Human Resources function in accordance with applicable policies. Where the violation is of a criminal or regulatory nature, the Disciplinary Committee may recommend escalation to the appropriate authorities. In such cases, the employees concerned shall co-operate with the relevant authorities. The Committee may also recommend initiation of civil and/or criminal proceedings, where warranted, in accordance with applicable laws.
4. All internal investigations shall follow the principles of natural justice and shall ensure that the relevant Employee is provided with reasonable opportunity to respond to the findings.

16. Policy Review & Updates

1. The Audit Committee of the Board shall monitor its effectiveness and review the implementation of this policy on a periodic basis.
2. The Board of Directors reserve the right to amend or modify the terms of this Policy from time to time.