

# ANTI-BRIBERY AND CORRUPTION POLICY

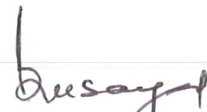
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MADHVI GOYAL  
HEAD HUMAN RESOURCES  
DOCUMENT OWNER



S K SAYAL  
MANAGING DIRECTOR & CEO  
APPROVED BY

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## 1. Background

The policy provides guidance on business ethics. It supplements the principles set out in the Code of Conduct. This policy reiterates to all employees of the Bharti Group to operate fairly, transparently and with integrity wherever they conduct business.

## 2. Scope

This policy is applicable to all employees of Bharti Real Estate. The policy is subject to all local legal/ regulatory requirements and amendments from time to time. There are NO exceptions to this policy.

## 3. Definitions

**Bribe / bribery** means the giving, offering, promising, requesting, agreeing to receive or, receipt or acceptance of any advantage of any nature, financial or non-financial including any payment, gift, loan, fee, or reward, services to or from any person which may, has the potential to influence or influences their decision making in any manner in the exercise of their duty;

**Corruption** means the misuse or abuse of office or power for personal gain. It also includes the offer of employment or any engagement with the company for providing or availing services and applies to government, private, public companies, corporate entity, any legal entity and nongovernment organizations.

An intention/attempt to influence another person's decision in the exercise of their official duties, directly or indirectly through any form of incentive or coercion is a bribe/corruption. Some examples are as follows:

- money or cash equivalent
- unreasonable or extravagant gifts, entertainment or hospitality;
- kickbacks;
- unwarranted allowances or expenses;
- uncompensated use of company services or facilities;
- anything else of value; or
- an advantage (whether financial or not).
- Coercion through abuse of authority or threat

Such payment, offer, promise or authorization may be direct or indirect.

#### **4. The Policy**

The company has a zero-tolerance approach towards bribery and corruption and is committed towards acting transparently, ethically and with integrity in all our business dealings and relationships wherever we operate. Any form of direct or indirect bribery or corruption (giving or taking) is strictly prohibited under the laws of the land.

Employees/executive directors must report any concerns they may have with respect to alleged or threatened non-compliance with this Policy. If an employee is not sure whether a particular conduct, behavior or practice(s) are acceptable, they must first check with functional/HR head or reach out to the Ombudsperson's office for assistance.

Employees violating this Policy will be subject to disciplinary proceedings that may lead to termination of services.

#### **5. Owner**

HR Head