

Subject: Anti-Bribery and Anti- Corruption Policy	Original issue date: 03.05.2022	Version No: 2.0
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HOME FIRST FINANCE COMPANY INDIA LIMITED
(“HomeFirst”)

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

A. INTRODUCTION:

Home First Finance Company India Ltd. (Company) is an organization that has a strong and transparent operational system to ensure utmost accountability in all affairs. This policy is drafted in accordance with the Company's Code of Conduct and other existing policy.

In accordance with this commitment, the Company has adopted this Anti-Corruption Compliance Policy (the "Policy"), which is applicable to all directors, officers, employees (whether permanent, fixed-term or temporary), agents, representatives and other associated persons of the Company (collectively "Company Personnel") and consultants, contractors, agency staff, business partners, and third-party representatives anywhere in the world, or any other person associated with us, wherever located who may be acting on behalf of the Company (collectively "Associated Parties").

B. PURPOSE:

The purpose of this policy is to set out the responsibilities of the Company and those individuals acting on its behalf in observing and upholding Company's position on bribery and corruption along with setting out the policy of the Company towards the prevention and identification of bribery and corruption and the procedures to be followed, if at all, any fraud is found or have an idea / impression of its existence.

C. PROHIBITED ACTIVITIES:

Bribery is an act of offering or accepting anything of value to influence the actions of another party. It is prohibited, directly or indirectly, for any Company Personnel to offer, give, request or accept any bribe to or from any person or company in order to gain commercial, contractual or regulatory advantage for Company, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

Company expects its Associated Parties to act with integrity and without thought or actions involving bribery and/or corruption.

The Policy required the Company Personnel to:

1. Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone.
2. Not to solicit business by offering, promising, or making any bribe or unofficial payment to suppliers.
3. Not to request or accept any kind of bribe or unusual payment or inducement that would not be authorised by the Company in the ordinary course of business.
4. To refuse any bribe or unusual payment and to do so in a manner that is not open to misunderstanding or give rise to false expectation, and to report any such offers.
5. Not to make facilitation payments. These are payments used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has a legal or other entitlement.

Criminal Offense (As defined in Bharatiya Nyaya Sanhita, 2023 (BNS))

It is a criminal offense to:

- a. Offer a bribe.
- b. Accept a bribe.
- c. Fail to prevent a bribe

All stakeholders of the Company should be made aware that if they are found guilty by a court of committing bribery, embezzlement or fraudulence an individual could face prosecution as per the norms of Bharatiya Nyaya Sanhita, 2023 (BNS).

D. GIFT AND HOSPITALITY

The Company acknowledges that giving and receiving of gifts and hospitality without any mala-fide intentions, or in other words, where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy. The employees can also accept edible items as Diwali or Festival gifts shared in good faith.

E. ACCEPTABLE BEHAVIOUR

Acceptable behaviour includes acting with honesty, fairness, and in compliance with all laws and internal policies. Company Personnel and Associated Parties are expected to exercise good judgment, avoid any impropriety, and conduct business dealings transparently, especially while engaging with public officials or third parties. Any action, gift, or hospitality that could even appear to compromise ethical standards must be avoided.

F. CONFLICTS OF INTEREST

A conflict of interest arises when personal interests, relationships, or external activities could improperly influence, or appear to influence, one's ability to perform their duties objectively and in the best interest of the Company. The Company is committed to identifying, disclosing, and appropriately managing any actual or potential conflicts. All employees must proactively disclose any such situations and refrain from participating in decision-making where a conflict exists.

G. RAISING A CONCERN

1. All personnel and associated parties are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy on ramakrishna.v@homefirstindia.com. If they are unsure whether a particular act constitutes bribery or corruption, they should immediately contact the concerned Business Head or Regional Business Head or Functional Head or Chief Human Resources Officer.
2. The employee or individual raising a concern can do so in confidence and without fear of reprisals. All reports raised are taken seriously and, where appropriate, investigated. No employee or individual will be discriminated against in any way as a result of reporting a concern in good faith.
3. If any instance of bribery or corruption is identified, Company management will take the remedial steps immediately. Company has its own system of investigating its staff members for violation of service conduct including financial irregularities, corruption, fraud or embezzlement.

This policy will be reviewed annually or as and when considered necessary by the Senior Management / Board of the Company

A copy of this Policy is available on the company's website - <https://homefirstindia.com/>