



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Nivara Home Finance Limited

CIN: U65922KA2014PLC077547

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1. INTRODUCTION

This policy is framed by Nivara Home Finance Limited ("**Nivara/Company**") to conduct business of the in an ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, where we operate.

In accordance with this commitment, the Company is adopting Anti-Bribery and Anti-Corruption Policy (the "**Policy**"), which is applicable to all directors, officers, employees (including Key Managerial Personnel), consultants, agents, representatives and other associated persons of the Company (collectively "**Company Personnel**").

2. DEFINITION

- "**Associated Persons**" refers to individuals or entities connected to the company in a way that influences its operations, decision-making, or regulatory responsibilities. This includes directors, officers, employees (including Key Managerial Personnel), consultants, agents, service provider etc.
- "**Bribery**" means to obtain or accept or attempt to obtain or promise for giving, receiving, soliciting or accepting of financial or other advantages, or any other thing of value, to influence or reward the behaviour of a person who is in a position of trust to perform a public, commercial or legal function to retain or obtain a commercial advantage.

A bribe may be anything of value and just money like gifts, inside information, offering employment, promotions etc.

- "**Corruption**" is dishonest, improper and usually unlawful conduct intended to secure a benefit undertaken by a person or organization entrusted with authority to attain illicit benefit or abuse power for one's private gain.
- "**Facilitation payments**" are unofficial payments made to secure or expedite a routine action by authorized official.
- "**Kickbacks**" are payments made in return for a business favor/advantage.
- "**Gift**" means any item of considerable value, given to/received from a party

3. GIFTS AND HOSPITALITY

This Policy does not prohibit normal and appropriate gifts, hospitality, entertainment and promotional or other similar business expenditure, such as calendars, diaries, pens, meals and invitations to theatre and sporting events (given and received), to or from Third Parties. However, the key determining factor for appropriateness of the gift or hospitality and/or its value would be based on facts and circumstances under which such gift or hospitality is provided. Any Gift value exceeding **Rs. 10,000/- (Rupees Ten Thousand only)** will be informed to the Head of Human Resource Department. The practice of giving gifts and hospitality is recognized as an established and important part of doing business. However, it is prohibited when they are used as bribes.

To avoid committing a bribery offence, the gift or hospitality must be:

- Reasonable and justifiable in all the circumstances.
- Intended to improve the image of the Company, better present its products and services or establish cordial relations.

The giving or receiving gifts or hospitality is acceptable under this Policy if all the following requirements are met:

- It is not made with the intention of influencing a Third Party to obtain/ retain business or a business advantage or to reward the provision or retention of business or a business advantage or in explicit or implicit exchange for favors/ benefits or for any other corrupt purpose.
- It complies with local laws and customs.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is appropriate in the circumstances.

4. PROHIBITED ACTIVITIES

Company expects its Associated Persons to act with integrity and not to indulge in any action involving bribery and/or corruption.

The Policy requires Associated Persons:

- a. Not to offer, promise or make any bribe or unauthorised payment or inducement of any kind to anyone.
- b. Not to solicit business by offering, promising, or making any bribe or unofficial payment to suppliers.
- c. 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.
- d. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy.
- e. Engage in any activity that might lead to breach of this Policy.

5. HOW TO RAISE CONCERN

Associated Persons are encouraged to raise concerns about any issue or suspicion of non-compliance with this Policy to the **Head of Human Resource Department**. If they are unsure whether a particular act constitutes bribery or corruption, they should immediately contact the Head of Human Resource Department.

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 persons will be discriminated against in any way as a result of reporting a concern in good faith.

Company has its own system of investigating its staff members for violation of service conduct including financial irregularities, corruption, fraud or embezzlement.

If any instance of bribery or corruption is identified, Company management will follow below actions to maintain integrity within the organization.

- a. **Verbal Warning:** If the bribery incident is not severe or is a first-time occurrence, a verbal warning may serve as an initial corrective measure.
- b. **Issue a formal warning letter/Email Warning:** In following situations written warning can be issued against associated persons:
 - Offering or promise to offer Promotion/employment in the Company.
 - Cash collection from customers and not depositing to Company's bank account.
 - Harassment or Discrimination.
 - Unauthorized disclosure of sensitive company information or trade secrets.
 - Stealing company property, falsifying financial records, or engaging in fraudulent activities.
 - Sharing or selling customer data.
 - Offering or promise for loan sanction.
 - Receiving bribe for loan sanction.
- c. **Conduct an investigation:** If the associated person is charged of above offences, then a formal enquiry/investigation will be initiated against such person.
- d. **Immediate suspension or termination of employment**
- e. **Recovery of damages if any.**

6. REVIEW OF POLICY

This policy will be administered by the Human Resource Department and can be reviewed annually or as and when considered necessary by the Senior Management of the Company.

A copy of this Policy is available on the company's website.