

ANTI -BRIBERY AND ANTI-CORRUPTION POLICY

Quantum Asset Management Company Private Limited (“Company”) Personnel are prohibited from directly or indirectly offering, giving, soliciting or receiving any form of bribe or other corrupt payment, or anything of value, to or from any person or organization, including government agencies/officials, public / private companies and employees of those public / private companies with which the Company interacts or does business, in the course of Company’s business with such persons/companies. It is the responsibility of the Company Personnel who are involved at any time in engaging the services of external consultants / service providers, suppliers or advisers to ensure that such individuals are made aware of the content of the Company’s Policy at the outset of the relationship and on a regular basis thereafter.

The Company’s Anti-Bribery and Anti – Corruption Policy is summarized in this section. Adherence to the guidelines set out in this policy will ensure that the Company and its personnel comply with anti-bribery and anti-corruption laws and governmental guidance. The policy reflects the Board’s desire to embed a culture of best practice in anti-bribery and anti-corruption measures and enforcement of the Policy will reduce the risk to the Company or its Personnel of incurring any criminal liability or reputational damage.

- (a) Political Contributions.** The Company has a policy of strict political neutrality. No funds, facilities or services of the Company of any kind may be paid or furnished to any political candidate for public office, any political party or official or any form of political campaign.

- (b) Charitable Contributions.** The Company will only provide donations to organizations that serve a legitimate public purpose, and which are themselves subject to high standards of transparency and accountability. Appropriate due diligence would be conducted on the proposed recipient charity and a full understanding obtained as to its bona fides.

The Company has adopted a separate policy for CSR Contribution in accordance with the Companies Act, 2013 and the CSR Contribution will be made in accordance with the CSR Policy.

- (c) Intermediaries.** The Company’s Policy prohibits the use of intermediaries to facilitate prohibited payments to any person, including Public Officials.

- (d) Third Parties.** The Company’s Policy forbids the use of third parties agents or business partners to undertake or do any activity on its behalf, which the Company or its Personnel are prohibited under this Policy.

(e) Agents, Representatives and Sub-Contractors. The Company's Policy applies with particular force to commercial agents, representatives, sub-contractors and third party agents.

(f) Joint Venture Partners. The Company will use its influence to ensure that joint ventures meet high integrity standards. Where the Company has majority control, it will ensure that the joint venture adopts the concepts and approach to bribery and corruption as set out in this Policy.

(g) Suppliers and Contractors. The Company will ensure that the procurement procedure for appointing suppliers and contractors is open, fair and transparent. The selection of contractors will be based on an evaluation of professional merit, and not based only on personal recommendations.

The Company shall communicate the provisions of the Policy to its suppliers and contractors, and it will expect them to abide by the principles set out in the Policy when working on the Company's behalf.

In order to maintain the highest standards of integrity, employees must ensure that:

They are fully briefed on the background and reputation for integrity of agents, representatives and sub-contractors before hiring them. The Company will conduct due diligence enquiries to review the integrity records of agents, representatives and sub-contractors before entering in to a commercial relationship with them.

The engagement process is fully documented; and that final approval of the selection of agents, representatives and sub-contractors as per the set process is made by someone other than the person selecting or managing the Company's relationship with them.

Agents, representatives and sub-contractors are fully briefed on the Company's Anti-Bribery and Anti-Corruption policy, and have made a formal commitment in writing to abide by it.

Fees and commissions agreed will be appropriate and justifiable remuneration for legitimate services rendered.

Once agreements are signed, the Company will continue to monitor its relationships with agents, representatives and subcontractors to ensure that there are no infringements of its Policy. Contractual agreements will include appropriate wording making it possible to withdraw from the relationship if agents, representatives or subcontractors fail to abide by this policy.

The Compliance and Legal team will assist with any questions about this policy and procedure, or any related matters.