



ANTI-CORRUPTION POLICY

The Firm 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, companies and employees of those companies with which the Firm interacts or does business, in the course of Firm's business with such persons. It is the responsibility of the Firm Personnel who are involved at any time in engaging the services of external consultants, suppliers or advisers to ensure that such individuals are made aware of the content of the Firm's Policy at the outset of the relationship and on a regular basis thereafter.

Adherence to the Firm's Anti Bribery and Anti-Corruption Policy ("Anti-Corruption Policy") will ensure that the Firm and its employees comply with anti-bribery and anti-corruption laws and governmental guidance. The Anti-Corruption 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 Firm or its Personnel of incurring any criminal liability or reputational damage.

The Firm and all employees shall have zero tolerance limit towards bribery and corruption which should be actively combatted

No employee may acquire or retain, either directly or indirectly, financial interests in an organization with which the Firm does business.

No employee shall pay / receive any secret or illegal payments, kickbacks, or other payments in any form to gain an unfair or improper advantage.

All the employees of the AMC must never offer/promise to pay or receive any value in any way of bribe to or from any person or entity with the intention to seek or retain business operations.

The Employee shall self- declare any financial interest in other organization / entity with whom the AMC is having business relationship.



- 1. Political Contributions** - The Firm has a policy of strict political neutrality. No funds, facilities or services of the Firm 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. Further, the political contributions if any to be made that shall be in accordance with provisions of the Companies Act, 2013.
- 2. Charitable Contributions** - The Firm 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.
- 3. Intermediaries** - The Firm's Policy prohibits the use of intermediaries to facilitate prohibited payments to any person, including Public Officials.
- 4. Third Parties** - The Firm's Policy forbids the use of third parties agents or business partners to undertake or do any activity on its behalf, which the Firm or its Personnel are prohibited under this Policy.
- 5. Agents, Representatives and Sub-Contractors** - The Firm's Anti-Corruption Policy applies with particular force to commercial agents, representatives, sub-contractors and third party agents.
- 6. Joint Venture Partners** - The Firm will use its influence to ensure that joint ventures meet high integrity standards. Where the Firm 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.
- 7. Suppliers and Contractors** - The Firm 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.



Obligation and Responsibility

The Firm 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 Firm'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 Firm will conduct due diligence enquiries to review the integrity records of agents, representatives and sub-contractors before entering into a commercial relationship with them.

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

Agents, representatives and sub-contractors are fully briefed on the Firm'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 Firm will continue to monitor its relationships with agents, representatives and subcontractors to ensure that there are no infringements of its Policy.

The Compliance and Legal Team will provide clarification applicable anti-corruption laws and this Policy, including responding to requests for information or for review of proposed activities.

Monitoring of the Firm's internal controls established in accordance with this Policy.

Violations

Employees who violate the Policy or any laws or regulations may also be subject to internal disciplinary action which may include termination of employment of such employee.

Any employee having knowledge of such activity shall inform the Head HR & Compliance Officer for immediate actioning.

The Head HR & Compliance Officer shall initiate appropriate actions in discussion with CEO and Associate Director.

**Record Keeping**

This Policy prohibits the maintenance of undisclosed or unrecorded funds or assets for any purpose and records that disguise or misrepresent any aspect of transaction.