



Unico Housing Finance Private Limited

Anti Bribery & Anti Corruption Policy

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Policy Number: UNICO/HR/004

Prepared and Proposed By	Chief People Officer / Chief Compliance Officer
Reviewed and Recommended By	Nomination & Remuneration Committee
Approved By	Board of Directors
Date of Approval	30 th April 2026
Date of last review	30 th April 2026
Effective Date	30 th April 2026
Review Cycle	Annually or as recommended by the Board of Directors

Purpose

Unico Housing Finance Private Limited (the "Company") is committed to conducting its business in an ethical, transparent, and lawful manner. The Company has a zero-tolerance approach to bribery and corruption. This policy outlines our commitment to prevent bribery and corruption in all forms and guides employees, contractors, and third parties to maintain the highest standards of integrity in their dealings on behalf of the Company.

The purpose of this Anti-Bribery & Anti-Corruption Policy (the "Policy") is to:

- Prevent bribery and corruption in any form, direct or indirect, in connection with the Company's activities.
- Protect the Company's reputation and maintain the trust of its stakeholders.

Scope

This Policy applies to all employees, directors, officers, contractors, agents, and third-party service providers of the Company, in all locations where the Company operates. This includes both domestic and international business transactions if any and relationships.

Applies To

All the employees, Customers, Vendors of Unico Housing Finance Private Limited.

Version Control

Version Number	Date of Approval	Approved Authority
1.0	16 th December 2024	Board of Directors
2.0	26 th March 2025	Board of Directors
3.0	30 th April 2026	Board of Directors

Table of Contents

Contents

1. Definition.....	3
2. Prohibited Conduct.....	3
3. Responsibilities of Employees.....	3
4. Third-Party Relationships.....	3
5. Gifts and Hospitality.....	4
6. Reporting and Whistleblowing.....	4
7. Protection to Complainant.....	4
8. Investigation of Allegations.....	4
9. Training and Awareness	4
10. Record-Keeping	4
11. Review and Monitoring	4

1. Definition

- **Bribery** refers to offering, giving, receiving, or soliciting something of value (such as money, gifts, favours, or any other benefits) to influence or reward the actions of someone in a position of authority in a way that is improper or unethical.
- **Corruption** refers to the abuse of entrusted power or position for personal or organizational gain and may involve bribery or other forms of unethical behaviour, including fraud, embezzlement, and extortion.
- **“Complainant”** under this policy means any individual or group of individuals who makes a complaint on bribery/corruption or has reasonable knowledge of such bribery/corruption has taken place.

2. Prohibited Conduct

The Company strictly prohibits:

- **Bribery:** Offering, giving, or receiving any form of bribe or kickback in exchange for favourable treatment, business, or any other advantage.
- **Facilitation Payments:** Small payments made to government officials to speed up or facilitate routine administrative processes (e.g., clearance or permits) are prohibited.
- **Gifts and Hospitality:** Offering or receiving gifts, or entertainment must be proportionate, reasonable, and not intended to influence any business decisions.
- **Conflict of Interest:** Employees and third parties should not engage in activities that conflict with the interests of the Company.

3. Responsibilities of Employees

- **Compliance:** All employees must comply with this Policy and report any violations or suspected violations. Failure to adhere to this Policy may result in disciplinary actions, including termination of employment.
- **Due Diligence:** Employees should conduct appropriate due diligence to ensure that third parties (e.g., agents, aggregators etc.) do not engage in corrupt practices.
- **Reporting:** Employees are encouraged to report any suspected or actual instances of bribery or corruption. Reports can be made confidentially through the Company's established reporting channels viz Whistle Blower Policy without fear of retaliation.

4. Third-Party Relationships

The Company recognizes that third parties (e.g., agents, consultants, vendors, and joint venture partners) may act on behalf of the Company in certain transactions. The Company expects that third parties will adhere to similar anti-bribery and anti-corruption standards. Before entering into a business relationship, the Company will conduct proper due diligence to assess the risk of bribery and corruption. In addition, the Company shall refrain from offering, promising, or giving any bribe or undue advantage to any public official or authority and will ensure that third parties acting on its behalf adhere to the same standard

5. Gifts and Hospitality

- **Acceptable Gifts and Hospitality:** Gifts, entertainment, and hospitality are acceptable only if they are reasonable, proportionate, and have no expectation of influencing the recipient's behaviours or business decisions. Any gift or similar offering should not exceed a value of INR 5000 in a financial year. Any instances where the value exceeds INR 5000 in a financial year must be reported to the HR Department immediately.
- **Prohibited Gifts:** Cash gifts or any gifts of substantial value are strictly prohibited. Employees must not accept or offer gifts if it could create a sense of obligation or create the appearance of improper influence.

6. Reporting and Whistleblowing

The Company encourages a culture of transparency, and employees should feel comfortable reporting any concerns related to bribery or corruption. The Company has established a whistleblowing procedure to allow individuals to report concerns in a confidential manner. [for more information, please see <https://unicoweb.site.s3.ap-south-1.amazonaws.com/WhistleBlowerPolicy.pdf>].

7. Protection to Complainant

The company will endeavour to take every step to protect the identity of any person who reports a suspected violation. No unfair treatment will be meted out to a complainant by virtue of his/ her having reported a protected disclosure under this Policy.

8. Investigation of Allegations

All allegations of bribery or corruption will be taken seriously and investigated thoroughly. If an employee is found to have violated this Policy, appropriate action will be taken, which may include disciplinary measures, up to and including termination of employment. In cases involving criminal conduct, the Company may report the matter to local police or relevant authorities.

9. Training and Awareness

The Company will provide training on anti-bribery and anti-corruption Policy, and the ethical standards expected from all employees and relevant third parties. Training will be mandatory for all new employees and periodically for existing staff, particularly those working in high-risk areas.

10. Record-Keeping

The Company will maintain accurate and complete financial records. All payments, gifts, and transactions must be properly documented in accordance with the Company's accounting policies and internal controls to ensure transparency and accountability.

11. Review and Monitoring

The Company will regularly review and update this Policy to ensure its effectiveness and compliance with current laws and regulations. The Company's compliance function will monitor adherence to the Policy, and any breaches will be investigated thoroughly.