

AFFLE (INDIA) LIMITED
ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. INTRODUCTION

Affle (India) Limited (hereinafter referred as 'the Company' or 'Affle') is committed to ensuring that persons acting on behalf of the Company and/or dealing with the Company do not indulge in (offer or accept) bribes, kickbacks or similar gifts, payments or advantages, whether in the public or private sector, for any purpose. This Policy provides necessary guidance on how to recognize and deal with bribery and corruption. The purpose is to establish clear rules to ensure compliance with all applicable anti-bribery and anti-corruption laws.

2. SCOPE

This Policy shall be applicable to all the Employees, Directors of the Company including that of its foreign subsidiaries. The scope of this policy shall also be extended to the Customers, Business Partners and Individuals to the extent of their business dealing with Affle and/or acting on behalf of Affle.

3. STATEMENT

The Company will not engage in bribery or any form of unethical inducement or payment including facilitation payments and kickbacks. The Company expects its business partners to act with integrity and without indulging in bribery or corruption.

4. PROHIBITED ACTIVITIES

This Policy prohibits the following (considering it to be an act of bribery or corruption):

- a) To offer, promise, make or accept any bribe or unauthorised payment or inducement of any kind to anyone
- b) To accept facilitation payments. These are the payments which may be used by businesses or individuals to secure or expedite the performance of a routine or necessary action. The Company will not tolerate such payments being received

5. GIFTS, HOSPITALITY AND ENTERTAINMENT

- a) The Company acknowledges that exchange of nominal gifts or souvenirs of a nominal value up to USD 100 (e.g. bouquets, pens, calendars, diaries, etc.) which are customarily given on special events/festivals/occasions and are infrequent in nature, are acceptable. In any case, such gifts shall not be lavish or in the form of cash or cash equivalents and any such

instances and offers or receipts (whether accepted or not by any person directly or indirectly) should be immediately reported to the Compliance Officer

- b) Reasonable and appropriate hospitality is not prohibited. However, it shall be strictly limited to meals as may be offered or received and only if it is reasonable and justifiable in all circumstances, considering reason and nature, appropriate type, value and not made with the intention of influencing or to obtain or retain business or a business advantage, or in explicit or implicit exchange for favours or benefits

6. POLITICAL CONTRIBUTIONS AND CHARITABLE DONATIONS

- a) The Company does not make contributions to any political party or to a politician. Stakeholders must not use Affle's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of Affle
- b) The Company may make charitable donations that are legal and ethical under local laws and practices. The Company will ensure that the charity or a support is for a legitimate cause and that donations are not being used as a channel for bribery

7. PROCEDURE FOR REPORTING & INITIAL ENQUIRIES

Any concern related to bribery or breach of this policy should be reported as per the procedure mentioned below:

- a) Complaint to be sent over an email to the Compliance Officer at compliance@affle.com
- b) Compliance Officer in consultation with the Chief Financial Officer shall thereafter forward it to the Chief Executive Officer within 48 hours of receipt of such complaint
- c) The Chief Executive Officer shall assess the legitimacy & severity of the complaint and accordingly, may seek advice of the Audit Committee on the action to be taken
- d) The Company shall strive to close the complaint within 30 days of receiving such email
- e) In case of any complaint against the Compliance Officer or Chief Financial Officer, the matter shall directly be reported to the Chief Executive Officer of the Company

8. PERIODIC REVIEW AND EVALUATION

The Company will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. The Company reserves the right to vary and/or amend the terms of this Policy from time to time.