



# **ANTI-BRIBERY & ANTI-CORRUPTION POLICY**

**Bajaj Financial Securities Limited – FY 26**

### Approvals/Sign-off Sheet:

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### Document Control Log

	Author	Approved By	Effective Date	Key Updates
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#### AMENDMENTS to the STANDARD, if any:

- Shall be made, only by the policy owner as approved by the Management.
- Shall be incorporated in all the controlled copies and entered in the Document Control Log enclosed in the template.

## Table of Contents

Introduction .....	4
Objective .....	4
Scope .....	4
Policy Endorsement .....	4
Definitions.....	4
Employees' Responsibilities: .....	5
Third Parties'/Stakeholders' Responsibilities: .....	6
Amendments .....	7

## Introduction

Bajaj Financial Securities Limited (Bajaj Broking) adopts and mirrors the Bajaj Finance Limited Group Anti-Bribery and Anti-Corruption Policy (“ABAC Policy”) framework while contextualizing to broking operations.

The Anti-Bribery and Anti-Corruption Policy (“ABAC Policy”) of Bajaj Broking is in furtherance to BFL’s Code of Conduct (CoC) for employees, Code of Ethics and Personal Conduct (CoEPC) for employees, stakeholders and third parties and in conformance with the legal and statutory framework of anti-corruption legislation prevalent in India. The Policy reflects the commitment of BFL Group and its management for maintaining highest ethical standards while undertaking open and fair business culture, following the best practices of Corporate Governance and enhancing the BFL Group’s reputation at all levels.

## Objective

The objective of this Policy is to ensure that neither:

- (a) BFL Group nor any of its employees (whether full-time or contractual employees and including trainees and interns), directors (*collectively referred as ‘Employees’*),
- (b) Agents, associates, vendors, consultants, advisors, representatives or intermediaries (*collectively referred as ‘Persons/Third parties’*),
- (c) Customers, Investors, Lenders, Depositors, Government, Shareholders, Regulators and the Society (*collectively referred as ‘Stakeholders’*),

indulge in any acts of ‘Bribery’ or ‘Corruption’ in discharge of their official duties towards the BFL Group, either in their own name or in the name of the BFL Group.

## Scope

This Policy applies to all employees, stakeholders, and any persons/third parties associated with the BFL Group and who may be transacting with BFSL and/or on behalf of the BFL Group. This Policy sets out the minimum standard that must be followed at all times.

## Policy Endorsement

The policy is endorsed by Legal and HR functions and approved by the ESG Committee of BFL.

## Definitions

- I. **‘Corruption’** refers to the abuse of entrusted power for receiving a personal gain, whether monetary or otherwise and includes ‘Bribery’ as a form of Corruption and is a punishable offence under the provisions of Prevention of Corruption (Amendment) Act, 2018.
- II. **‘Bribery’** refers to solicitation or receipt of a personal favor for official action and includes receiving a ‘Bribe’ and/or a third-party gratification, in the form of reward, gift or favor bestowed or promised whether monetary or otherwise, with a view to influence the action of a person.
- III. **‘Facilitation Payments’** refers to unofficial payments made to secure or expedite a routine government action by a Government Official. These include payments made, directly or indirectly, to Government Officials for the purpose of expediting or securing routine, non-

discretionary government action, such as securing a business permit or license, customs invoice or visa, or providing services like police protection.

- IV. **Gifts:** The term “gifts” includes tendering to a recipient, products, services, cash, or cash equivalents (e.g., cheques, traveller’s cheques, gift cards, gift certificates, vouchers, loans and shares) and all business courtesies, gratuities, discounts, favors and other things of value for which the recipient does not pay the fair market value.
- V. **Charitable Contribution:** The term refers to financial support or goods and services donated to non-profit organizations, in the form of cash contribution, or 'in kind'. Such charitable contributions are not dependent on, nor made to secure, a business deal.

## Employees’ Responsibilities:

The BFL Group prohibits corruption and bribery in any form to or from any person. Compliance with provisions of ABAC policy is expected from all the employees of BFL Group as under:

- **Policy Compliance:** Employees should read and understand the ABAC Policy and must ensure compliance with the terms and conditions mentioned in the Policy.
- **Training:** Employees should participate in and complete the annual training on anti-bribery and associated aspects provided by the BFSL as part of CoEPC.
- **Due Diligence:** Employees should ensure proper due diligence of the Persons/Third Parties before onboarding.
- **Integrity:** Employees should not offer or give to any Persons/Third Parties or accept from any Persons/Third Parties any bribes, facilitation payments, or any other improper benefits.
- **Conflict of Interest:** Employees should refrain from hiring one’s own firm(s) or firm(s) belonging to close relatives for supply of goods or services to BFL Group. Close Relatives as defined in CoEPC, shall mean and include spouse, Father, Stepfather, Mother, Stepmother, Son, Stepson, Son’s wife, Daughter, Stepdaughter, Daughter’s husband, Brother, Stepbrother, Sister, Stepsister. The officials entrusted to identify/empanel any vendor(s)/firm(s) for the supply of goods and services to BFL Group, should perform their duties on an arm’s length basis and declare that they have no vested interest or relationship with such vendor/representative of such firm. Any exception to this guideline should be carefully evaluated before its rejection or approval by the respective Business unit head and Head of human resources. Employees may refer to the comprehensive guidelines on avoiding conflict of interest stated in the Code of Ethics and Personal Conduct.
- **Gifts:** Employees shall not accept any gifts, hospitality and/or related expenses from any person, which may lead to conflict of interest with the business of BFL Group. Also, employees should strictly adhere to CoC and CoEPC, which also details about anti bribery, gifts, hospitality & expenses.
- **Charitable Contributions and Sponsorships:**
  1. **BFL Group’s Contribution:** Charitable contributions by BFL Group (money, goods, or services) must:
    - (a) Be made to a legitimate, bona fide organization for charitable causes.
    - (b) Be permitted under all applicable laws and regulations.
  2. **Employees’ Contribution:** Properly documented personal donations made by the employees of BFL Group are allowed provided those donations should not interfere or in any way conflict with the official work of the employee or with BFL Group in any manner.

- **Political Contributions and Sponsorships:** Employees should not make any political contributions on behalf of BFL Group to any Political party and should not misrepresent or imply that contributions have been made on behalf of BFL Group.
- **Dealing with Government, Legislative Officials and Political Parties:**
  1. Any direct/indirect valuable product/service/kind offering to public official/servant in form of bribe or corruption while dealing on behalf of the company is prohibited.
  2. Any favour from political parties or any association with political parties is prohibited.
  3. In case any employee proposes to represent BFSL while dealing with political parties, the same shall be done by or under the instructions of personnel authorized by the Managing Director.
  4. In case any government tenders, appropriate procedures shall be followed which ensure independence, fairness, and transparency during the whole tender process cycle. No favour shall be taken from government officials while bidding or allocation of tenders.
- **Use of Trademark:** BFL Group employees should not use BFL Group's name or trademark for political activities of any kind or provide money or other forms of support to political parties on behalf of BFL Group.
- **Exception:** Any exception to this Policy should be carefully evaluated before its rejection or approval by the respective Business unit head and Head of human resources.
- **Whistle Blower Mechanism:** Immediately report any violation of BFL Group's ABAC policy to whistleblower email id [whistleblower@bajajbroking.in](mailto:whistleblower@bajajbroking.in). Appropriate action shall be taken as per the Board approved Whistle Blower Policy. To know more details and about the manner of reporting, the whistle blower policy could be accessed under Legal section of Company's website [CLICK HERE](#).

### Third Parties'/Stakeholders' Responsibilities:

The BFL Group prohibits corruption and bribery in any form to or from any person. Compliance with provisions of ABAC policy is expected from all the third parties / stakeholders associated with BFL Group as under:

- Not offer any gifts and shall not provide any hospitality or its related expenses to the employees of BFL Group.
- Strictly adhere to BFSL's CoEPC which also details about anti-bribery, gifts, hospitality & expenses.
- Strictly adhere to the terms of this Policy and Suppliers' Code of Conduct while carrying on their assignments with BFL Group.
- Necessarily allow the respective BFL Group entity to inspect the books of accounts and other documents of all third parties associated, as part of any investigation in alleged/identified case(s) of corruption/bribery.
- **Whistle Blower Mechanism:** Immediately report any violation of BFL Group's ABAC policy to whistleblower email id [whistleblower@bajajbroking.in](mailto:whistleblower@bajajbroking.in). Appropriate action shall be taken as per the Board approved Whistle Blower Policy. To know more details and about the manner of reporting, the whistle blower policy could be accessed under Legal section of Company's website [CLICK HERE](#).

## Amendments

The policy can be modified, amended, or withdrawn at any point of time by issuing a notification to this effect.

