

Anti-Bribery and Anti-Corruption Policy

A. Background

At Go Digit General Insurance Limited (“Company” or “DIGIT”), we are committed to conducting all business dealings in a professional, fair, and ethical manner, upholding integrity and transparency in every interaction. In line with this commitment, the Company has adopted a strict “Zero-Tolerance” stance towards all forms of bribery and corruption, as articulated under its Code of Conduct and Ethics.

Pursuant to applicable Indian law, including the Prevention of Corruption Act, 1988 (as amended by the Prevention of Corruption (Amendment) Act, 2018) and the Indian Penal Code, 1860, the acceptance or attempted acceptance of any unlawful gratification—defined as any advantage or item of value not lawfully due—constitutes a punishable offence.

B. Scope and Applicability

This policy applies to all Employees (on-roll and contractual) and Service Providers/ Vendors of the Company (including all third-party entities or individuals who engage in business activities on behalf of the Company, including but not limited to agents, intermediaries, contractors, and suppliers) and shall come into effect on the date of approval by the Whistle Blower Committee of the Company.

C. Responsibility

Prevention, detection and reporting of any act of Bribery or Corruption is the responsibility of each person/entity associated with the Company.

D. Definitions

1. **Bribe** – is an act of offering, promising or providing an inducement or reward, directly or indirectly in order to influence a decision of the recipient in an improper manner or to induce improper performance from the recipient, all of which may result in a business, financial or other kind of gain or advantage to the offeror.
2. **Corruption** – is the abuse of entrusted power for gain, whether directly or indirectly, to self or to a related party.
3. **You** – shall mean Employees (on-roll and contractual), Service Providers/ Vendors of the Company.

E. Policy Statement

The Company has adopted a “Zero-Tolerance” approach to bribery and corruption. You shall not:

1. Offer, promise, give, request or agree to give a Bribe in any form, directly or indirectly to any person including a public and/or government official to obtain or retain business or an advantage.
2. Solicit business, by offering Bribe or by making any kind of unofficial payment to customers or potential customers.

3. Make any donations or charitable contributions to a public office or a public official and/or a government official in order to influence, obtain or retain business.
4. Accept, receive, promise or agree to receive a Bribe or any kind of inducement or benefit in any form, directly or indirectly from any customer or vendor or any other person with whom the Company has or may have a business relationship
5. Use any of the monies or other Assets of the Company for the establishment of any unlawful or unrecorded fund, or for the making of any unlawful or undisclosed payment.
6. Enter into any relationship with third parties (including vendors, agents, and consultants) that may create a conflict of interest or impropriety.
7. Ensure disclosure to reporting authority about relationship with a potential vendor/employee/agent/service provider.

F. Gifts and Entertainment

Any gift or entertainment which is not proportionate and reasonable, and which is not consistent with the normal business practice of developing and maintaining business relationship should not be accepted or offered.

- As regards to giving of gifts, the Company will abide by all applicable laws/regulations in this regard. You shall adhere to the procurement process for procuring gifts offered during festive seasons.
- You shall not offer or accept any kind of gratification, payment or inducement that would not fit within the ordinary course of business, except gifts and/or hospitality which are customary in nature during festive season and provided the value of such gifts is modest and appropriate and not exceeding INR 5000/-.
- You should seek advice from Head – Human Resources or Head – Legal & Compliance, as and when necessary, before giving or accepting any gifts which do not fall within the purview of the clauses mentioned above.

G. Compliance Procedures and Training

As part of the Company's ongoing commitment to anti-corruption compliance, You will receive and review this Policy. You must then certify in writing that you (1) have reviewed the Policy; (2) agree to abide by the Policy; and (3) agree to report any potential violations of the Policy to compliance@godigit.com or to such other id as may be designated by the Company from time to time.

In addition, the Company will offer periodic anti-corruption compliance training programs to educate employees about the requirements and obligations of anti-corruption laws and this Policy. You must participate in such training and the HR/ Compliance Team must retain attendance records establishing compliance with this requirement.

H. Agreements with Digit's Vendors

Specific anti-bribery and anti-corruption clause will be included in vendor agreements that will be entered or renewed after 1st April 2020.

I. Reporting

GO DIGIT GENERAL INSURANCE LIMITED

You should bring to the notice of your supervisor/manager any incident where You believe or suspect that a conflict of this policy has occurred or may occur. You may also use the whistle blower mechanism under the Company's Whistle Blowing Policy for raising concerns to the senior management.

J. Breach

Any breach or violations noticed/reported would be dealt as per the disciplinary procedure prescribed in the Code of Conduct.

K. Review

The Managing Director and CEO of the Company is authorized to make changes in the foregoing policy as may be required from time to time. The Policy, along with changes, if any, shall be reviewed by the Board of Directors on annual basis.

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