

RAR FINCARE LIMITED

POLICY	Anti- Bribery & Anti-Corruption Policy
Approving Authority:	Board of Directors
Effective Date	June 26, 2024
Review Cycle:	As recommended by the Board of Directors or in case of any Regulatory Changes

Anti-Bribery & Anti-Corruption Policy

Purpose & Objective

The Anti-Bribery & Anti-Corruption Policy outlines the principles that RAR Fincare Limited (“Company”. “We”) follows to ensure compliance with all applicable anti-bribery and anti-corruption regulations; and to ensure that the Company’s business is conducted in an ethical and socially responsible manner. The objective of this Policy is to ensure that appropriate anti-bribery and anti-corruption procedures are in place.

It is our policy to conduct our business in an honest and ethical manner. The Company adopts a zero-tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate.

This policy applies to all individuals working at all levels and grades, including officers, directors, employees (whether permanent, fixed term or temporary), consultants, and appointed third party representatives of the Company (including but not limited to agents, intermediaries, and associates) at all locations. Violation of this policy shall be severely sanctioned, including where appropriate disciplinary procedures, up to and including termination of employment and possible referral to the appropriate criminal or regulatory authorities.

The Company has embedded within its business the following principles and controls to achieve zero tolerance against bribery and corruption:

Policy Requirements		
No acceptance or offering of bribes and facilitating payments		Strictly prohibited from giving or receiving bribes (i.e. personal benefit for any improper advantage) as well as facilitating payments (regardless of whether these are common practices in a particular country) which involve anything of value to government officials in order to expedite or facilitate routine, non-discretionary government actions.
Charitable and political donations		Prohibited from payment of donations that are linked to obtaining any improper advantage, including facilitating payments.
Gifts and Entertainment		Prohibited from providing gift or entertainment to clients, prospects, government officials or their family members when such expenses are not incurred while conducting company business and/or do not satisfy this policy and our related policies.
Payment Recordkeeping	&	All relevant expenditures must be properly documented, approved and maintained for a minimum of 6 years.

Policy Requirements	
Government officials	Required to adhere to our additional recordkeeping requirements regarding all expenditures related to government officials. Written prior approval is required when a certain threshold is exceeded.
Due Diligence on Third-Party Representatives	Required to conduct an appropriate due diligence review on background, reputation, and business capability before engaging or contracting with any third-party representatives and to include anti-corruption provisions in any such contract.
Periodic training	Required to carry out appropriate training to employees regarding the Anti-Corruption Policy and their role to ensure compliance.

Monitoring and Review

We shall monitor compliance with our Anti-Corruption Policy. Further, all persons covered by this policy must promptly report any violation or suspected violation of this policy to the Chief Executive Officer, Head - HR and / or to the Whistleblower email ID mail@rarfincare.com.

The Policy shall be subjected to review as per Board's recommendations.

Approved by the Board of Directors in its meeting held on June 26, 2024