



## Anti – Bribery and Anti – Corruption Policy

**Namdev Finvest Limited**  
**(Formerly Known as Namdev Finvest Private Limited)**

**Registered Office:**

**“Namdev House”**

Plot No. 21, Neer Sagar-A, Bhankrota,  
Jaipur, Rajasthan – 302026, India

CIN: U65921RJ1997PLC047090



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<b>Prepared and proposed by</b>	<b>Ms. Sakshi Sharma</b>	
<b>Approver</b>	<b>Board of Directors</b>	<b>May 2026</b>



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## 1. Introduction

**Namdev Finvest Limited (NFL)** formerly known as **Namdev Finvest Private Limited** is a Non-Banking Financial Company having valid Certificate of Registration with Reserve Bank of India vide registration No. B-10.00260 on 20th August 2007 under current RBI classification as NBFC – Non-Deposit taking Investment and credit company (“NBFC-ICC”) under NBFC Middle Layer – RBI (NBFC-Scale Based Regulation) Directions, 2023.

It is focused on offering finance to MSME, Two-wheelers, Solar panel loan, Electric Vehicle (EV) loan, EV charging station loan and all kind of light commercial vehicles segment.

## 2. Regulatory Requirement

Anti-Bribery and Anti-Corruption Policy is being formulated in accordance with Prevention of Corruption Act, 1988.

The Prevention of Corruption Act, 1988 (“PCA”) and many other Anti-Bribery and Corruption laws and regulations around the world make it clear that bribery and corruption is prohibited and illegal. Violation of these regulations lead to fines, penalties, reputational damage, and in some cases criminal liability.

## 3. About the Policy

NFL’s interactions with Government Officials, as well as private sector (non-government) individuals (“Private Parties”), are generally subject to anti-corruption laws and regulations, and the Company and its employees must not take any action that violates or facilitates the violation of any such laws or regulations. Anti-corruption laws enacted by various countries and jurisdictions prohibit the Company from offering, promising, giving or authorizing others to give, or receiving anything of value, directly or indirectly, to or from any party to influence official action, improperly obtain or retain business or otherwise gain an unfair business advantage. Anti- Bribery and Anti-Corruption Policy (“Policy”) and the similar anti-corruption laws enacted by various countries do not prevent NFL from working with governments and promoting NFL to Government Officials and state-owned or controlled enterprises; rather, they are intended to promote ethical conduct and to prevent bribery and other corrupt practices when dealing with Government or Private Parties.

Gifts, business entertainment, travel, lodging, meals, charitable contributions, educational or employment opportunities, and assumption or forgiveness of debt may be treated as improper and illegal under the applicable anti-corruption laws, as may any other thing of value, if offered or given for an improper purpose. Further, many jurisdictions often impose strict monetary and other limitations on such expenses, regardless of improper intent. In all instances, gifts and entertainment provided to Government Officials and Private Parties must be in connection with the promotion and demonstration of NFL’s products and services and be reasonable and proportionate under the circumstances. Company’s employees may not use personal funds or a third party to circumvent the requirements of this Policy.

In addition, you may not accept a gift or entertainment that appears intended or designed to induce you to act in a manner inconsistent with the best interests of the Company, and/or might create the appearance that you are engaging a Business Partner or entering into a business

transaction based on factors other than the merits of the product or service offered or the quality of the professionals involved.

#### **4. Who is a Government Official?**

The term “Government Official” is broadly defined and includes (a) officials and employees of; and (b) any person acting in an official capacity for or on behalf of:

- Any government, governmental agency or instrumentality, or any public international organization; any company that is controlled by a government or governmental agency (not withstanding that the company may be publicly listed); and any political party, party official or political candidate.

Government Officials are not always easily identifiable. Consult the Compliance Department of the Company for guidance on whether an individual should be considered a Government Official.

#### **5. Gifts and Entertainment**

Meals, entertainment and gifts for Government Officials or Private Parties may be permissible in certain circumstances, if they are reasonable to maximum limit of 5000/- INR whether in cash or in kind and appropriate in light of local law, custom and practice, not excessive in nature or frequency and not offered or given for an improper purpose. Expenditures, such as travel and lodging, directly related to the promotion or demonstration of the Company’s business products or services may also be acceptable if they are reasonable and not made corruptly to influence official action or secure an improper advantage. Nothing should be offered to any party, nor should anything be received from any party, if it could reasonably be perceived as an attempt to gain an unfair business advantage or if it could adversely affect the Company’s reputation.

##### **a) Pre-Clearance Requirements**

Pre-clearance must be obtained from the Chief Compliance Officer of the Company. Employees who do not obtain pre-clearance when required may not be reimbursed and may be subject to disciplinary action. Keep in mind that if local laws or regulations do not permit a Government Official or Private Parties to accept a meal, entertainment, travel or gift, you are not permitted to offer or give it, regardless of value.

##### **b) Meals**

You must seek pre-clearance for expenses related to meals involving a Government Official or Private Parties, if the amount of the meal is expected to exceed INR 5,000 (Indian Rupees Five Thousand) per head.

##### **c) Business Entertainment and Travel**

Any business entertainment, including travel and lodging provided to a Government Official or Private Parties must be pre-cleared. Entertainment includes concerts, cultural events and sporting events.

**d) Gifts**

All gifts to a Government Official or Private Parties require pre-clearance, except those of nominal value such as inexpensive pens and items with the Company's logo.

**e) Charitable Contributions**

All requests for charitable contributions that might confer a benefit on, or that are proposed by, or at the request of, a Government Official/Government Entity or Private Parties must be pre-cleared.

**f) Client Spouses and Families**

Providing anything of value to a spouse or family member of a Government Official or Private Party, such as a meal, gift, entertainment, travel, or employment, may be viewed as improper. It is, therefore, discouraged and requires pre-clearance, which may only be granted in exceptional circumstances.

**g) Monitoring of Client Expenses**

All client expenses will be reviewed at least annually for reasonableness and appropriateness in light of local law, custom and practice. Any expenses viewed as excessive (>5000/-) in nature or frequency will be noted and discussed with the responsible employee and may include disciplinary action, depending on the circumstances.

**h) Receipt of Gifts and Entertainment**

You may not accept a gift or entertainment that appears intended or designed to induce you to act in a manner inconsistent with the best interests of the Company, and/or might create the appearance that you are engaging a Business Partner, as defined below, or entering into a business transaction based on factors other than the merits of the product or service offered or the quality of the professionals involved.

**6. Business Partners Who May Act on Behalf of The Company**

A "Business Partner" is a third party who assists / will assist NFL in obtaining or retaining business, especially if that third party will or may interact with Government Officials or Private Parties on behalf of the Company such as consultants, finders, introducing brokers, placement agents and any other business intermediaries. It also includes vendors and suppliers who provide essential goods and services to the Company and, in doing so, expose the Company to anti-corruption risk.

The Company may not use a Business Partner to do something indirectly that it may not do directly. Business Partners that present the most corruption-related risk are those who act on behalf of the Company and which will or may have interaction with Government Officials and state- controlled entities or Private Parties. Further, Contracts with Business Partners must include, as appropriate, the anti-corruption representations and warranties set forth in **Appendix A** to this Policy.

The concerned employee / official, or Compliance Officer of the Company, should retain all documentation related to engagement of the Business Partner. The concerned employee/official should monitor, as appropriate, the Business Partner's activities and compliance with the

applicable anti-corruption laws, as well as review compensation and invoices to ensure reasonableness and raise concerns, if any with the Compliance Officer.

## **7. Transactional Due Diligence**

Employees engaging in any investment, joint venture, or other transaction on behalf of the Company shall exercise appropriate caution, taking into account the nature of the transaction, the counterparty's reputation, the industry, and the geographic location involved. Particular care should be taken in transactions that may involve, directly or indirectly, any Government Official or entities owned or controlled by such officials, as well as private parties. In such cases, employees should ensure that the transaction and the counterparty are appropriately assessed, and no commitments or transfer of funds, assets, or anything of value are made without adequate review.

## **8. Employment of Individuals Referred by Clients**

The employment by the Company to the candidates who are relatives of or are closely connected to or referred by current or potential clients involves potential risk, both to the Company and to the individuals within the Company making such employment decisions. If not managed correctly, hiring of such candidates could expose NFL to sanctions under anti-corruption laws.

Hiring decisions should be based on the merits of the individual candidate, vis-à-vis others being considered for the position, if applicable, and such candidate should go through the usual hiring procedures. A candidate should not be hired solely as a favor for a client in order to create, maintain or improve a business relationship.

## **9. Facilitation Payments**

"Facilitation Payments" are nominal payments made to Government Officials or Private Parties to expedite routine actions, such as activating electricity service, obtaining licenses etc. The Company prohibits these types of payments except in circumstances involving employee health and safety. You must contact the Compliance Officer of the Company prior to making any facilitation payment unless an employee's health or safety would be threatened by a delay in making the facilitation payment. Any such payments must be accurately recorded in the books and records.

## **10. Accurate Books and Records**

All Company employees must do their part to ensure that the Company's books and records accurately and fairly reflect, in reasonable detail, the Company's transactions.

## **11. Violations of This Policy or Applicable Law**

Employees must promptly report potential violations of this Policy or applicable laws or regulations to their supervisors or Compliance Officer of the Company. An employee who suspects a violation and reports it in good faith will not be subject to retaliation.

Violations of the anti-corruption laws may result in criminal, civil and regulatory penalties against the Company and individual employees and could negatively impact the Company's ability to conduct business in particular jurisdictions. Failure to comply with this Policy may also result in disciplinary action, including termination of employment.

Employees should contact the Compliance Officer of the Company if there are questions about the Policy.

## **12. Protection of Reporting Person**

- No unfair treatment will be meted out to a reporting person by virtue of his/ her having reported an event of anti-bribery or anti-corruption under this policy. The Company, as a policy, condemns any kind of discrimination, harassment, victimization, or any other unfair employment practice being adopted against the reporting person. Complete protection will, therefore, be given to reporting person against any unfair practice like retaliation, threat, or intimidation of termination / suspension of service, disciplinary action, transfer, demotion, refusal of promotion or the like including any direct or indirect use of authority to obstruct the reporting person's right to continue to perform his/her duties / functions including making further reporting of such events. The Company will take steps to minimize the difficulties which the reporting person may experience because of making the disclosure of such events. Thus, if the reporting person is required to give evidence in criminal or disciplinary proceedings, the Company will arrange for the reporting person to receive advice about the procedure, etc.
- The identity of the reporting person shall be kept confidential to the extent possible and permitted under law.
- Any other Employee assisting in the said investigation shall also be protected to the same extent as the reporting person.

## **13. Anti-Corruption Language for Business Partner Contracts**

- The provisions of Section I and II below must be included in the Business Partner contract/agreement. Any substantive changes to the language below must be approved by the Compliance Officer of the Company.
- The provisions in Section II may be included either as part of the anti-corruption section or in another section of the contract.
- "You" may be changed to the Business Partner name or to "Consultant," "Representative," or a similar term or abbreviation, as appropriate.

## APPENDIX A – ANTI-BRIBERY

### Selection

- The Service Provider shall comply with all applicable anti-bribery and anti-corruption laws while performing services.
- The Service Provider shall not offer, give, receive, or promise anything of value to obtain any undue or improper advantage.
- In case of any interaction with Government Officials or third parties, the Service Provider shall act in a transparent and lawful manner.
- The Service Provider shall maintain reasonable and accurate records related to the services and provide the same to the Company, if required.
- The Service Provider shall promptly inform the Company of any material issue that may impact compliance with anti-corruption requirements.
- The Company may take appropriate action, including suspension or termination of services, in case of non-compliance.
- All payments shall be made through normal banking channels to the Service Provider's designated account.
- The Company may disclose relevant information to regulators, auditors, or authorities, as required.