Number: STR/HR/V.01/2025-26

Title: Anti Bribery & Anti-Corruption Policy

	NAME	TITLE	SIGNATURE	DATE
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Authoriser	Ishpreet Singh Gandhi	Director		16th Jul 2025

Effective Date:	12th Nov 2025
Review Date:	12th Nov 2026

Change History

SOP no.	Effective Date	Significant Changes	Previous SOP no.

1. Purpose and Objective

StrideOne Capital is committed to the highest standards of integrity, ethical conduct, and transparency in its business operations. This Anti-Bribery and Anti-Corruption (ABAC) Policy reflects our zero-tolerance approach to bribery, corruption, and unethical practices in line with:

- The **Prevention of Corruption Act, 1988 (India)**
- The **Companies Act, 2013**
- The **Prevention of Money Laundering Act, 2002 (PMLA)**
- Applicable **Reserve Bank of India (RBI) directions** including Master Directions on Know Your Customer (KYC), Outsourcing Guidelines, and Fair Practices Code
- Relevant global anti-bribery standards

This Policy ensures that employees, directors, officers, and third parties understand and comply with applicable anti-bribery and anti-corruption obligations in all jurisdictions where StrideOne Capital operates.

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2. Scope and Applicability

This Policy applies to:

- All permanent, temporary, and contractual employees of StrideOne Capital
- Directors, officers, and members of the management team
- Consultants, vendors, service providers, intermediaries, agents, and business partners
- Any third party acting for or on behalf of the Company, directly or indirectly

This Policy applies to all business operations, whether within India or abroad, to the extent permitted under applicable laws.

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3. Definitions

- **Bribery:** Offering, giving, soliciting, or receiving anything of value to improperly influence actions or secure an unfair business advantage.
- **Corruption:** Abuse of entrusted power for private gain.
- **Facilitation Payments:** Unofficial payments made to expedite routine government or administrative actions. These are strictly prohibited.
- **Public Official:** Includes government employees, elected representatives, members of political parties, officials of public international organizations, and employees of government-controlled or state-owned entities.
- **Conflict of Interest:** A situation where personal interests could interfere with the interests or reputation of the Company.

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4. Policy Statements

4.1 Prohibition of Bribery and Corruption

StrideOne Capital prohibits:

- Offering, giving, promising, requesting, soliciting, or accepting bribes, kickbacks, or anything of value to influence business decisions.
- Any form of bribery, directly or indirectly, with public officials or private individuals.
- Any action that could reasonably be perceived as corrupt, unethical, or a violation of this Policy.

4.2 Facilitation Payments

Facilitation payments are strictly prohibited, even where considered a local custom. Any request for such payments must be reported to the Compliance Officer immediately.

4.3 Gifts, Hospitality & Entertainment

Reasonable, transparent, and customary gifts or hospitality may be offered or accepted only if:

- They are not intended to influence or appear to influence a business decision
- The value does not exceed INR 5,000 (or equivalent) per occasion
- They are properly recorded in the Company's gift register
- Pre-approval from the Compliance Officer is obtained for any gift or hospitality exceeding this limit

Lavish, frequent, or inappropriate gifts, entertainment, or hospitality are strictly prohibited.

4.4 Political and Charitable Contributions

- No political donations may be made on behalf of the Company, in line with RBI guidelines on political exposure and reputational risk management.
- Charitable contributions may only be made after due diligence, approval by authorised personnel, and verification that the recipient is not linked to any public official or corrupt practices.

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5. Accepting Gifts and Entertainment

Employees may not accept gifts or entertainment from:

- Existing or prospective clients, vendors, agents, or business partners where a conflict of interest exists
- Any party where acceptance could appear to compromise business judgment
- Cash or cash equivalents (e.g., gift cards, vouchers) under any circumstances

Permitted gifts:

- Nominal value items (e.g., stationery, diaries, food items) up to INR 5,000
- Occasional business meals or entertainment, where the giver is present
- Gifts based on personal, family relationships, not linked to the Company's business

If in doubt, employees must disclose the offer and seek written approval from their manager or the Compliance Officer.

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6. Third-Party Engagements

- **Mandatory due diligence** must be conducted on third parties before engagement, consistent with RBI's Outsourcing Guidelines.
- Contracts must contain anti-bribery, anti-corruption, and audit rights clauses.
- The Company remains responsible for ensuring third parties acting on its behalf comply with this Policy and applicable laws.

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7. Books, Records, and Internal Controls

StrideOne Capital will maintain accurate, transparent, and complete records for all transactions. It is strictly prohibited to:

- Falsify, misrepresent, or omit information in Company records
- Maintain off-the-book transactions or unauthorized accounts
- Use personal funds for Company business purposes

All financial and non-financial records must comply with applicable RBI regulations, accounting standards, and internal policies.

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8. Consequences of Breach

Violations of this Policy may result in:

- Disciplinary action, up to and including termination of employment or contract
- Civil or criminal liability under applicable laws, including prosecution under the Prevention of Corruption Act, PMLA, and RBI regulations
- Notification to regulatory authorities, including the RBI, where required.

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9. Responsibilities

9.1 Employees

- Read, understand, and comply with this Policy
- Refrain from any act that could constitute or appear to constitute bribery or corruption
- Immediately report any actual or suspected violations

9.2 Managers and Senior Leadership

- Promote a culture of integrity and compliance within teams

- Implement appropriate internal controls and monitoring mechanisms
- Escalate concerns to the Compliance Officer

9.3 Compliance Officer

- Owns and oversees this Policy and its effective implementation
- Investigates reported concerns, ensuring confidentiality and fairness
- Conducts regular risk assessments and policy reviews
- Reports significant violations to senior management and, where applicable, to regulatory authorities

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10. Reporting and Whistle-blower Protection

- Employees and third parties are encouraged to report actual or suspected bribery, corruption, or policy breaches in good faith
- Reports may be made to the Compliance Officer or through the Whistle-blower Mechanism
- All reports will be treated confidentially; retaliation against whistle-blowers is strictly prohibited

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11. Investigations and Disciplinary Action

- All concerns will be investigated promptly, following procedures outlined in the Whistle-blower Policy
- Violations will attract strict disciplinary action, including suspension, termination, and legal proceedings
- Where appropriate, regulatory authorities, including the RBI, may be notified

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12. Training and Communication

- All employees will receive quarterly training on anti-bribery, anti-corruption, and ethical conduct
- This Policy will be shared with all employees at the time of onboarding and made available on the Company's internal portal
- Updates to this Policy will be communicated in a timely manner

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13. Review of Policy

This Policy will be reviewed annually, or earlier if required by:

- Changes in laws, RBI directions, or regulatory guidelines
- Material changes in the Company's business operations

- Identified gaps or risks in the implementation of this Policy

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14. Contact for Queries and Reporting

For questions, concerns, or to report violations, contact:

Compliance Officer
StrideOne Capital Email: **whistleblower@strideone.in**