One 97 Communications Limited
ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Purpose of the policy

One 97 Communications Limited has adopted this Anti-Bribery and Anti-Corruption Policy ("**Policy**") to support compliance with the Prevention of Corruption Act, 1988 ("**PCA**"). It also discloses certain details of this policy in its Business Responsibility and Sustainability Report under Regulation 34(2)(f) of the SEBI Listing Regulations.

Version Control

Version	Date of Board approval	Effective date
1.0	July 10, 2021	July 10, 2021
1.1	January 19, 2024	January 19, 2024
1.2	November 4, 2025	November 4, 2025
1.3	March 26, 2026	March 26, 2026
1.4	May 6, 2026	May 6, 2026
1.5	October 26, 2026	October 26, 2026

Review Mechanism

As required under applicable law or as and when deemed necessary or advisable by the Company.

1. Statement of Policy and Applicability

This Policy applies to One 97 Communications Limited and its subsidiaries that have formally adopted this Policy (together, the **"Company"**). The Company has zero tolerance for bribery and corruption in any form, whether direct or indirect. This Policy applies to all Stakeholders and sets out the principles they must follow to comply with Applicable Laws in all dealings for or on behalf of the Company.

2. Administration of the Policy

The General Counsel of the Company is responsible to administer this Policy. Clarifications, queries or disclosures relating to this Policy may be sent to abac@paytm.com.

3. Important Definitions

The following capitalized terms used in the Policy shall have the meanings ascribed to them below:

(i) **Anything of Value:** "Anything of Value" means any gratification, pecuniary or otherwise, other than legitimate consideration, fee or remuneration, and includes an "undue advantage" as defined under Section 2(d) of the PCA.

(ii) **Applicable Laws:** All laws relating to bribery and corruption that apply to the Company (wherever it operates) or the Stakeholder(s), including the PCA.

(iii) **Bribe/Bribery:** To **"bribe" or "bribery"** means directly or indirectly offering, promising, giving, authorizing, soliciting, accepting or agreeing to accept Anything of Value, to or from a Government Official or any other person (including an employee of a commercial entity), to improperly influence any act or decision, or to obtain or retain business or a business/commercial advantage.

(iv) **Government Official:** Government Official includes:

(a) Any "public servant" as defined under Section 2(c) of the PCA, and any officer or employee, regardless of rank, of any national, state or local government, government department, agency or regulatory authority, or government-owned or controlled entity, in India or abroad;

(b) A political candidate or a political party or any officer or employee of a political party;

(c) Any person acting in an official capacity for or on behalf of any government or public international organization; or

(d) Members of the judiciary and officers of court(s).

(v) **Stakeholders:** Stakeholders refer to and include internal as well as external stakeholders of the Company:

(a) **Internal Stakeholder(s)** includes member(s) of the Board of Directors, employee(s), which includes permanent, fixed-term/ contractual, or temporary employees as well as interns and project trainee(s).

(b) **External Stakeholder(s)** includes any individual or entity, including merchants, sellers, consultants, vendors, donees or Intermediaries, working or acting for or on behalf of the Company and their respective employees, representative(s) or agent(s).

4. Prohibition on Bribery

The Company prohibits Bribery in all forms. No Stakeholder shall, directly or indirectly, offer, promise, give, solicit, accept, abet or authorize any Bribe to or from any Government Official or any other person, to improperly influence any act or decision, to obtain or retain business or commercial advantage for the Company or any other person, or to secure any improper advantage or personal gain.

5. Books, Records and Internal Controls

All payments and expenditure made by or on behalf of the Company shall be properly authorized, supported by appropriate documentation and accurately recorded in its books of account, in accordance with applicable law and the Company's internal policies.

6. Compliance with Anti-Bribery and Anti-Corruption Policy

All Stakeholders shall comply with this Policy. In case any Stakeholder violates this Policy, or authorizes or knowingly allows a violation of it, such Stakeholder may be subject to appropriate action, including disciplinary action in accordance with the Company's policies vis-à-vis Internal Stakeholders and termination of relationship vis-à-vis External Stakeholders.

7. Gifts, Hospitality and Business Expenditure

All business expenditure must be incurred for legitimate business purposes (without creating the impression of or expecting a *"quid pro quo")* and be accurately documented. Gifts, hospitality, travel, sponsorships and similar expenditure shall be approved and recorded in accordance with the Company's applicable internal policies and approval matrix.

(a) Gifts

Internal Stakeholders may give or receive gifts of modest value in their professional capacity, provided the gift is bona fide, given openly as a courtesy in the normal course of business, and nothing is expected in return. Gifts in cash or bullion are not permitted (other than customary festive gifts such as silver coins of nominal value). Gifts to a Government Official shall not exceed what such Government Official is permitted to accept under the rules applicable to him/her. Subject to the aforesaid, guidelines for gifts are stated below:

Gifts to commercial entities	**Gifts to Government Officials**	**Approving Authority**
Up to INR 8,000 (or equivalent amount, if incurred in Foreign Currency) *per person*	Up to INR 4,000 (or equivalent amount, if incurred in Foreign Currency) *per person*	Head of Department
INR 8,000 to INR 16,000 (or equivalent amount, if incurred in Foreign Currency) *per person*	**INR** 4,000 to **INR** 8,000 (or equivalent amount, if incurred in Foreign Currency) *per person*	Head of Department & General Counsel
Above INR 16,000 (or equivalent amount, if incurred in Foreign Currency)	INR 8,000 (or equivalent amount, if incurred in Foreign Currency) & above ***per person***	Only as per exceptions approved by General Counsel
Note: The limits prescribed above are applicable for gifts given to a person in a financial year and will be subject to Applicable Laws.		

(b) Business Hospitality & Entertainment

Reasonable and *bona fide* business hospitality (such as meals and refreshments) and entertainment may be given or received openly and transparently, and Internal Stakeholders may attend business events sponsored by External Stakeholders for legitimate business purposes. No hospitality or entertainment shall involve any illegal or improper activity.

(c) Travel and Accommodation for Government Officials

The Company shall not pay for the travel or accommodation of a Government Official, except where it relates directly to the performance of his/her official duties, is permitted under the rules governing such Government Official, and is reasonable, *bona fide* and properly documented.

8. Political Contributions, Donations, Sponsorships and Fines

(a) Charitable Contributions or Donations

Charitable contributions and donations shall be bona fide, shall not be made to obtain any improper advantage, and shall be made in compliance with Applicable Laws, and the Company's CSR Policy.

(b) Sponsorships

Sponsorships of sports, cultural, educational or other promotional activities shall be made only for bona fide purposes, transparently, and not as a means of Bribery.

(c) Fines and penalties

Fines and penalties imposed by any Government authority shall be paid only to that authority through official channels, and never to any individual.

9. Dealing with Government Officials

(a) Engagement or hiring of services of ex-government officials

The Company may engage or hire former Government Officials on merit, subject to any cooling-off or prior-permission requirements applicable to them under the rules governing their former service, and not as a reward for, or to influence, any official act.

10. Engaging third parties

The Company shall engage third parties, only for legitimate business purposes and on commercially justifiable terms. Contracts shall be in writing and include appropriate anti-bribery and anti-corruption provisions.

11. Training

The Company shall conduct periodic anti-bribery and anti-corruption training and awareness programmes for Internal Stakeholders.

12. Reporting of violations of the Policy

Stakeholders shall promptly report any actual or suspected Bribery or other violation of this Policy or Applicable Laws in accordance with the Company's Vigil Mechanism / Whistle Blower Policy.

Email: whistleblower@paytm.com