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# ANTI-CORRUPTION POLICY

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## Overview

This document sets out the policy of Samasta Microfinance Limited “SMFL” on combating corruption and to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to act professionally, fairly and with integrity in all our dealings wherever we operate. We are also committed to implement and enforce effective systems to counter bribery. This document sets out the Company's long-standing policy on bribery and other forms of unlawful payments (“Policy”). It applies to all subsidiaries and operations.

## Scope

This Policy shall apply to all staff including directors, officers, shareholders of the Company and all appointed third party representatives of Company such as agents, consultants, others working on behalf of the Company irrespective of their location, function or grade. We require those providing services on our behalf to undertake their business without bribery or corruption.

It is required to comply with all applicable anti-bribery and corruption laws and regulations when doing business on behalf of the company. These laws include applicable laws relating to anti bribery and anti-corruption.

## Definitions

“Bribery” is the “offer of undue reward by or to any person in a public sector, private employee, colleague or representative of another organisation in order to influence his her behaviour in office and to induce them to act in contravention of the rules and regulations, ethics, trust and integrity”.

“Corruption” is the “abuse of entrusted power for private gain”

## The key principles

Samasta employees and third-party service providers are prohibited from:

- ✚ Offering or suggesting a Bribe, or authorising the offer or suggestion of a Bribe
- ✚ Paying Bribes
- ✚ Soliciting or accepting a Bribe to influence a decision, to obtain unauthorised
- ✚ access to confidential information, or to commit or omit to do an act, whether or
- ✚ not the outcome would have been the same without the Bribe

- ✚ Making facilitation payments
- ✚ Using another party to conduct any of the above
- ✚ Using vendors or suppliers that do not have high standards on bribery and corruption
- ✚ Processing funds known to be, or reasonably suspected of being, the proceeds of bribery or corruption

For the purposes of this Policy ‘facilitation payment’ means small unofficial payments paid to speed up an administrative process or secure a routine government action by an official. However, facilitation payments should be contrasted with official, lawful, receipted payments (typically to an organisation rather than an individual) to expedite certain functions, e.g. where there is a choice of fast track services to obtain a passport.

If the safety or loss of liberty of staff or third-party service provider is at risk, the payment should not be refused. In all circumstances any demand for facilitation payments must be reported to the compliance officer immediately.

Infringements of this Policy may result in disciplinary action by Samasta, including dismissal, and may involve criminal or regulatory proceedings for individuals and Samasta.

This Policy should be read in conjunction with Samasta’s Gifts policy. As it has been widely acknowledged that corporate gifts and hospitality, whether lavish or not, can be used as a subterfuge for bribery and corruption, It is therefore important that compliance with this Policy includes adherence to the rules within Samasta’s Gifts policy as well as following the spirit of Samasta’s zero-tolerance approach to bribery and corruption.

## Ethical guidance

Policies and guidance cannot cover every circumstance. We therefore provide some guidance below to help you make decisions about appropriate business conduct. If you can answer yes to following quick questions, you might feel comfortable in proceeding.

- ✚ Is the action legal?
- ✚ Is it right? Is it honest?
- ✚ Is the action consistent with the terms and spirit of this policy and our values as a business?
- ✚ Does it avoid creating a sense of obligation?
- ✚ Can I justify this to my manager, the responsible person and to my family?

 Would I feel comfortable if the action became public knowledge?

In any case of doubt, you should discuss the situation with the nominated responsible person.

The following are examples of relationships and events that could lead to a higher risk of bribery and corruption.

## Fee payments

Where an agent or intermediary is used to make introductions to officials of public or government bodies and agencies, steps must be taken to ensure that any fee paid by Samasta is proportionate to the activity being performed and in accordance with local law and the requirements of this anti-corruption policy.

No such fee payments can be made without the express approval of business line management who may obtain advice from Compliance or, if necessary.

## Public officials

Appropriate due diligence must be conducted when public officials, their relatives or their close associates are invited to any entertainment provided by Samasta, or when payments are made to them by or on behalf of Samasta.

## Political donations

No political contribution to a candidate for public office, an elected official, a political party or political action committee, can be made, on behalf of Samasta without prior approval from the Compliance Officer.

## Offers of employment

Care must be taken when providing work experience or employment to people that are connected to, or are relatives of, senior public officials. Although it is not prohibited to employ such staff it is important to avoid any perception that any hiring is for an improper purpose. Where such a hiring is being considered, approval from business line management must be obtained.

## Ten Practical procedures

### 1. Responsible person

Samasta will at all times have a nominated director or senior manager responsible for overseeing and reporting on the implementation of this Policy. The director/senior manager

will be sufficiently senior to be fairly regarded as independently minded. The responsibilities of the compliance manager shall include:

- ✚ Designing and implementing an effective anti-corruption program in accordance Samasta Anti-Corruption Policy
- ✚ Providing necessary direction and support in adherence to the Anti-corruption Policy
- ✚ Timely reporting of suspected violations to the Company's Board

## **2. Review and report**

Compliance Officer will monitor, review and at least annually report on the effectiveness of and adherence to this Policy, and the steps taken to implement it. The report will be submitted for approval to the board of directors.

The annual report and accounts of Samasta will include an assessment of the workings and effectiveness of this Policy.

## **3. Senior management information**

Samasta's senior management will be kept informed of the steps taken to implement the policy, the conclusions of any reviews and any material findings arising out of the work of the responsible person.

## **4. Employee conduct**

Employees are required to report any knowledge or suspicions of the request for, offering, giving or receiving of a corrupt payment. A failure to do so may be considered gross misconduct.

No employee will suffer demotion, penalty or other adverse consequence for refusing to pay or accept a corrupt payment even if such a refusal may result in Samasta losing business or failing to win a deal.

## **5. Gifts and hospitality**

Employees may accept gifts and hospitality only in conformity with the Samasta's Gift Policy.

## **6. Internal communication and training**

Samasta will communicate these principles and practical procedures to all employees, and will reflect this policy on its website and in the Employee Handbook/Code of Conduct etc/.

Training will be provided to staff so that they are aware of this Policy, relevant anti-corruption legislation and their obligations under the policy and their contract of employment. Enhanced training will be provided to employees in particularly high risk roles.

## **7. Associates**

Samasta will conduct screening procedures on agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to it ("Associates") to protect Samasta from the risk of it being associated with or benefiting from corrupt payments, and to ensure that the highest ethical standards are maintained.

Samasta requires that Associates are made aware of this Policy and confirm that they will not participate in any transaction that will put it in breach of the Policy, and that such Associates have adequate procedures for preventing their own staff engaging in the giving or receiving of bribes, kickbacks, or facilitation/speed payments.

## **8. Internal record keeping**

The Company shall make and keep books, records, and accounts that conform to the highest professional standards of accuracy and consistency and that, in reasonable detail, accurately and fairly reflect the Company's transactions.

## **9. Auditing**

The annual reports of Samasta's internal and external auditors will include an assessment of the implementation of this Policy.

## **10. Raising Concern**

The Company welcomes whistle-blower reports and encourages staff and third parties to draw to its attention instances of corporate as well as individual employee wrongdoing within Samasta. The principles laid down in Vigilance and Whistle Blowers Policy shall apply to protect the interest of the whistle blower.

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