

Anti Bribery Policy

Purpose of this Policy

Firstsource values its reputation for conducting business in an ethical and transparent manner. It also recognises that it would suffer tangible and intangible losses including reputational losses, if there is an involvement in bribery at a corporate level and / or by any employee, agent, representative, vendor or business partner of Firstsource.

Firstsource has designed this Anti-Bribery Policy to ensure adherence to the highest ethical standards, comply with the UK Bribery Act 2010 (UKBA), the US Foreign Corrupt Practices Act 1977 (FCPA) and applicable local anti-bribery laws. This Policy will also enable employees, agents, representatives, vendors and business partners to identify and effectively report a potential breach. Any breach of this Policy will be treated seriously by Firstsource and is likely to result in disciplinary action, which may even include termination of employment of employees and the immediate termination of any vendor or business partner arrangements.

Firstsource has a “zero tolerance” policy towards bribery.

Policy coverage

All Firstsource employees, agents, representatives, vendors and business partners must become familiar and comply with Firstsource’s Anti-Bribery Policy.

What is Bribery?

Bribery is an inducement or reward received, offered, promised, or provided to gain a personal, commercial, regulatory or contractual advantage. An inducement or reward could be in the nature of cash, gifts, entertainment, loans, inflated commissions, unauthorized rebates, political / charitable donations or other advantages to which the person is not normally entitled to.

Common business practices, if abused, can be construed as improper or corrupt payments. In some cases, the offer of an inducement is unlawful, even if it is not accepted. Giving, offering, requesting and receiving such an advantage can be construed as a bribe, even if it is made indirectly through a third party.

Key Prohibitions

The key prohibitions as part of this Anti-Bribery Policy are:

1. Offering, promising, or giving a financial or other advantage to another person to induce a person or organization to perform improperly a relevant function or to reward a person or organization for the improper performance of such a function or activity
2. Requesting, agreeing to receive or accepting a financial or other advantage to perform improperly a relevant function or activity
3. Making facilitation or “grease” payments, even if this represents local practice or custom

4. Offering or accepting gifts to or from foreign public officials (a public sector, state or central government employee)

Guidance on specific areas:

a. Gifts and Entertainment

It might be customary, at times, to give or exchange unsolicited gifts during the traditional festive seasons or during certain corporate events. In addition, it may be business custom to accept and/or provide entertainment to a third party. To the extent this is done, this must always be in line with Firstsource's Gifts and Entertainment Policy. This Policy prohibits receipt or giving of any gifts with an intent to derive any benefit in return. The provision of gifts or entertainment to Government officials is strictly prohibited. Please read the Gifts and Entertainment Policy for detailed guidance on this.

b. Political contributions

Firstsource prohibits receiving or offering (directly or indirectly) remuneration, gifts or making any payments or donations or providing comparable benefits to any political party or candidate on its behalf.

c. Charitable contributions

Charitable contributions should not be used as a scheme for bribery. Such contributions must always meet high ethical standards and avoid even the perception of impropriety. There should be no solicitation for participation in employee or Firstsource sponsored charitable or quasi charitable endeavours. The purpose of charitable contribution must not be directly or indirectly linked with business interest.

d. Facilitation payments

Facilitation payments (made to expedite the performance of a routine action by any person or organization) are prohibited.

e. Government officials

Payments to Government officials are prohibited.

f. Expense reimbursements

All expenses must be presented along with all relevant supporting documentation such as invoices or receipts. Any inaccurate or misleading claims are strictly in breach of this Policy.

g. Third Parties

Firstsource requires a risk based due diligence to be conducted on third parties it has business dealings with. Further, it should be ensured that sign offs are obtained from relevant third parties on Firstsource's Anti-Bribery and Gifts and Entertainment policies.

Any payment which is improper in nature (including bribes) must not be routed through a third party.

Reporting Concerns

The prevention, detection and reporting of bribery is the responsibility of all employees, agents, representatives, vendors and business partners throughout Firstsource. We are committed to ensuring that all of us have a safe, reliable, and confidential way of reporting any suspicious activity. We want each and every member of staff, agents, representatives, vendors and/or business partners of Firstsource to know how they can raise concerns.

We are committed to ensuring that no one suffers detrimental treatment through refusing to take part in bribery, or because of reporting a concern in good faith.

Any concerns regarding bribery can be reported at whistleblowing@firstsource.com. This facility is available to employees, agents, representatives, vendors and business partners for raising their concerns. They can report concerns in confidence and without fear of retribution. Firstsource prohibits retribution against any complainant and if this were to arise, appropriate penal action will be taken against the individuals involved in such retribution. All reports raised are taken seriously and, where appropriate, will be investigated fully.

When in doubt, please consult

Firstsource recognizes that industry practices may vary from country to country or from culture to culture. What is considered unacceptable in one place may be normal or usual practice in another. Nevertheless, a strict adherence to the guidelines set out in this Anti-Bribery Policy is expected of all employees, agents, representatives, vendors and business partners at all times. If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, then please contact the Enterprise Risk Management team at AntiBribery.ERM@firstsource.com