

**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**  
**OF**  
**CITY UNION BANK LIMITED**  
**(Approved on 26-06-2023)**

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### **1. Objective**

City Union Bank Limited (**the "Bank"**) is committed to the prevention, deterrence, and detection of fraud, bribery, and all other corrupt business practices. It is the policy of the Bank to conduct all its business activities with honesty, integrity, and the highest possible ethical standards.

## 2. Scope

This anti-bribery and anti-corruption policy (this "Policy") applies to all Directors and Employees (collectively referred to as **"you"** in this Policy).

## 3. Definitions.

- **"Bribe"** means anything of value and includes, but is not limited to: cash, cash equivalents and gifts.
- **"Corruption"** includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral, or incompatible with ethical standards.
- **"Compliance Officer"** shall be the Company Secretary of the Bank.
- **"Government / public official"** means employees and officials, whether elected or appointed, who hold any governmental position, including legislative, administrative, or judicial position of any kind; is a candidate for any governmental position; any official or employee of a Bank wholly or partially controlled by a government (such as state-owned companies); or an official in a political party, in a country or territory.
- **"Senior Management"** means Senior Management as defined under clause (d) of sub-regulation (1) of regulation 16 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

## 4. Prohibitions under the Policy:

### 4.1 Bribe:

You must not engage in any form of bribery either directly or indirectly.

### 4.2 Kickback:

You must not make or accept kickbacks. Kickbacks are typically payments made in return for a business favor or advantage.

### 4.3 Willful Blindness:

If you willfully ignore or turn a blind eye to any evidence of corruption or bribery within your department and / or around you, it will be taken seriously against you. Although such conduct

may be “passive”, i.e., you may not have directly participated in or may not have directly benefited from, the corruption or bribery concerned, the willful blindness to the same can, depending upon the circumstances, carry the same disciplinary action as an intentional act.

#### **5. Gifts:**

This Policy does not prohibit normal, reasonable, appropriate, modest and bona fide gifts (given and received), if **its purpose** is to improve the Bank’s image and services or establish cordial relations.

#### **6. Charitable Donations apart from CSR:**

Apart from its CSR activities, the Bank may support local charities or provide sponsorship that are legal and ethical under local laws and practices and also within the corporate governance framework of the organization.

#### **7. Procedure to Raise Concerns:**

Every person, to whom this policy applies too, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he/ she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be raised with the head of Human Resource dept.

#### **8. Penalties:**

The head of Human Resource Management dept., shall, after considering inputs, if any, from the head of Vigilance dept., have the discretion on the following:

- ❖ to recommend appropriate disciplinary action, including suspension and termination of service of such a defaulting Person
- ❖ recommend to the Board for suitable action against such a Person based on nature of violation in order to enforce remedies available to the Bank under applicable laws.

#### **9. Waiver and Amendment of the Policy**

The Human Resource department will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible.

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