

**AFFLE (INDIA) LIMITED**  
**CODE OF CONDUCT FOR VENDORS**

**1. INTRODUCTION**

Affle (India) Limited (hereinafter referred to as the “Company” or “Affle”) is a fast-growing company with offices, team members and vendors collaborating across multiple countries and geographies. Affle strives to maintain the highest standards of corporate governance and transparency and holds its employees & Directors to the sound standards of professional conduct. For upholding similar standards for its vendors, Affle has formulated the “Code of Conduct for Vendors”. Although the Company understands and recognizes that its vendors are independent entities operating in a diverse legal and cultural environment, the Company expects each of its vendor to conduct themselves in any interaction with the Company in accordance with this Code.

**2. APPLICABILITY OF THE CODE**

This Code shall apply to all vendors including prospective vendors, sub-vendors, dealers and their respective personnel, officers, directors, representatives, agents, contractors and any other entity acting on the vendor behalf (collectively "vendor's representatives").

**3. VENDOR ACKNOWLEDGEMENT**

The vendor shall acknowledge that their failure to comply with the applicable laws, rules and regulations directly affects the Company. The vendor undertakes to comply with this code of conduct and to cause its representatives to adhere to the principles as defined in this policy under heading 4.

**4. PRINCIPLES**

**I. ANTI-CORRUPTION AND ANTI-BRIBERY**

Affle is committed to ensuring that persons acting on behalf of the Company and/or dealing with the Company do not indulge in (offer or accept) bribes, kickbacks or similar gifts, payments or advantages, whether in the public or private sector, for any purpose. The vendor agrees to be bound by Affle’s Anti-Corruption and Anti Bribery Policy available on the corporate website of the Company or may be directly accessed from the link below.

<https://affle.com/images/pdf/2022/Anti%20Corruption%20&%20Anti%20Bribery%20Policy.pdf>

**II. MONEY LAUNDERING**

Money laundering is a deliberate attempt to move cash or assets derived from criminal activities into legal and legitimate financial activities. Affle is committed to comply with all applicable anti-money laundering and terrorist financing laws. The vendor must not participate in or facilitate money laundering. By doing so, even unintentionally,

could result in civil and/or criminal penalties against the vendor. The vendor must adhere to laws in respect of prevention of money laundering & terrorist financing.

### **III. DATA PROTECTION**

Affle respects the privacy of each of its stakeholder and has a comprehensive data privacy governance in place. The Company does not disclose information to third parties without the explicit consent of its stakeholders unless required by law to do so. The vendor shall be required to take consent and provide all the requisite right to the Data Subjects. The vendor shall take all necessary steps to prevent any misuse and/or leakage of data, whether intentional or unintentional, and ensure the use of data in accordance with applicable laws & regulations.

In the event of any data breach (actual or suspected), the vendor, at no cost to Affle, shall notify Affle of such data breach within 24 hours after becoming aware of or first suspecting the data breach. The vendor shall provide details with Affle in relation to - a) nature and impact of data breach; b) any investigations into such data breach; c) likely consequences of data breach; and d) any measures already taken or proposed to address data breach including but not limited to mitigate its possible adverse effects and prevent the reoccurrence of breach or any similar breach.

### **IV. LABOR PRACTICES**

Affle maintains a zero-tolerance approach towards modern slavery and is committed to prevent any occurrence or incident of modern slavery across its business operations. The vendor must adhere to the same approach and shall observe specific prohibitions against the use of forced, compulsory or trafficked labor or children, as part of their processes, to ensure ethical business practices. The vendor shall provide a work environment free of discrimination, harassment and be an Equal Opportunity Employer. The vendor shall treat all its employees fairly, without any regard to age, race, creed, colour, religion, gender, nationality, ancestry, disability, sexual orientation, marital status or any other basis as protected by state or local laws. Moreover, the vendor shall comply with applicable local labor laws, including those regarding minimum wage, working hours and provide benefits of employment.

### **V. HEALTH AND SAFETY**

Affle is committed to create a safe and healthy atmosphere for employees with key focus on hygiene & cleanliness of workplace, employee's health, women safety, medical support services and taking proactive measures to identify & minimize unforeseen accidents. The vendor shall ensure safe and hygienic conditions available at their workplaces, develop defined rules, flows for safety, fire prevention and health protection. The vendor shall take effective measures to prevent potential accidents, injuries and illness of the employees at workplace.

### **VI. ENVIRONMENT**

Affle is committed to create a positive environmental impact. The Company expects its vendors to be conscious of the environmental impact caused by their business

operations and ensure the implementation of adequate measures to reduce the negative impact on community, natural resources and the environment.

#### **VII. TAX**

The vendor must adhere to all laws and regulations in respect of payment of taxes applicable to its business in the countries in which it operates.

#### **VIII. CONFIDENTIALITY**

The vendor must always maintain confidentiality of information and apply no lesser security measures than those which it applies to its own confidential or proprietary information. The vendor shall not use confidential information in any way detrimental and protect it from any unauthorized disclosure or use. This shall be applicable irrespective of whether a Non-Disclosure Agreement or Confidentiality Agreement is signed between the Company and the vendor or not.

#### **IX. LEGAL AND REGULATORY COMPLIANCE**

The vendor must always comply with all applicable governmental laws, rules and regulations. A vendor must acquire appropriate knowledge of the legal requirements relating to their business while performing services for or on behalf of the Company to enable them to appropriately offset any risk of non-compliance.

#### **X. INSIDER TRADING**

Insider Trading is an act of trading/dealing/pledging in the securities of a public-listed company by any person in possession of or with access to unpublished price sensitive information (UPSI) of the listed company, not available to the general public and it is a punishable offence. The vendor who has access to, or knowledge of, material nonpublic information from or about a client of Affle are prohibited from buying, selling, pledging or otherwise trading in the Affle's stock or other securities. The vendor must comply with insider trading laws and agrees to be bound by Affle's Insider Trading Prohibition Code available on the corporate website of the Company or may be directly accessed from the link below.

<https://affle.com/images/pdf/2022/Insider%20Trading%20Prohibition%20Code.pdf>

#### **5. SCOPE AND APPLICABILITY**

This policy was approved by the ESG Committee of the Board on March 31, 2023 and will be effective from this date. It is applicable to Affle (India) Limited, its subsidiaries and associate companies.

Where there is doubt as to the application of the Code or the appropriate course of action to be adopted, you may seek resolution from legal or compliance team of the Company, by writing to them at [legal@affle.com](mailto:legal@affle.com) or [compliance@affle.com](mailto:compliance@affle.com).