ECOS (I) Mobility & Hospitality Limited

ANTI CORRUPTION, ANTI FRAUD & ANTI MONEY LAUNDERING POLICY

ECOS MOBILITY Succession Policy and L&D Approach

Contents

ANTI CORRUPTION, ANTI FRAUD & ANTI MONEY ANTI LAUNDERING POLICY 1

1. Purpose 3

2. Scope 3

3. Definitions 4

4. Policy Statement 5

6. Gifts, Hospitality, Expenses & Entertainment 6

7. Government Interaction and Facilitation Payments 7

8. Political Contributions 7

9. Third Party Due Diligence 8

10. Record Keeping and Controls 8

11. Fraud Prevention, Detection & Response 9

12. Anti Money Laundering 9

13. Training and Awareness 10

14. Risk Assessment 10

15. Objectives and Targets 11

16. Commitment 12

17. Violations and Action 12

18. Responsibility and Oversight 12

19. References 12

20. Oversight and Updates 12

Frequently Asked Questions (FAQs) – Anti-Corruption & Anti-Bribery Policy 14

DOCUMENT CONTROL & APPROVAL 16

1. Purpose

Ecos (India) Mobility & Hospitality Limited ("the Company") is committed to conducting its business with integrity, fairness, transparency, and accountability. The Company maintains a zero-tolerance approach toward bribery and corruption in any form and ensures full compliance with all applicable anti-bribery and anti-corruption laws, including the Prevention of Corruption Act, 1988 and other relevant regulations.

This Policy establishes the principles, standards, and controls designed to prevent, detect, and address bribery and corrupt practices. It provides guidance to employees and associated persons on identifying, avoiding, and reporting prohibited conduct.

This Policy is also intended to ensure that all covered persons understand circumstances that may create the appearance of impropriety, exercise appropriate judgment in situations involving corruption risk, and promptly seek guidance or report concerns where necessary.

The Policy also establishes principles and controls for the prevention, detection, reporting and investigation of fraud and money laundering risks associated with the Company's operations and business relationships.

2. Scope

2.1 This policy applies to:

(a) All directors, officers and employees of Eco Mobility, whether permanent, contractual, or temporary;
(b) Contractors, consultants, agents, intermediaries, advisors and temporary staff engaged by the Company and
(c) Third parties acting on behalf of or representing the company, including suppliers, distributors, service providers and business partners
(d) all associates, subsidiaries, branches and business units of the Company, to the extent applicable under the Company's governance framework; any person acting for or on behalf of the Company in any capacity including in relation to dealings with customers, vendors, distributors, government authorities, regulators, business counterparties, contractors, consultants, agents, intermediaries, advisors, temporary staff engaged by the Company and
(e) Third parties acting on behalf of or representing the company, including suppliers, distributors, service providers, business partners or in connection with sales, procurement, regulatory interfaces, licensing, permits, certifications, inspections, business development, lobbying, consulting, or other representative functions.

2.2 The The Audit Committee shall review this Policy periodically, and the Compliance Officer shall be responsible for day-to-day implementation, guidance, administration, escalation, and enforcement of this Policy.

2.3 Compliance with this Policy is mandatory for all covered persons. Violations may

ECOS (I) MOBILITY & HOSPITALITY LTD.
45 A&B, 1st floor, Corner Market, Malviya Nagar, New Delhi - 110017

result in disciplinary action, termination of employment or engagement, and/or legal proceedings, or referral and intimation to relevant authorities, where appropriate

2.4 All covered persons are required to comply with both the letter and spirit of this Policy. Where applicable law is stricter than this Policy, the stricter legal requirement will prevail.

3. Definitions

In this policy

(a) "Eco Mobility" or "Company" means Ecos (India) Mobility & Hospitality Limited, and all its associates, subsidiaries, branches and business units known in any name anywhere in the world.

(b) Bribery: refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, soliciting or lobbying something of value or of an advantage so to induce or influence an action or business decision.

(c) Corruption: Abuse of entrusted power for private gain, including bribery, kickbacks, facilitation payments, and improper influence Embezzlement, Extortion, Nepotism, Influence Peddling.

(d) Bribe: A bribe refers to any inducement, reward, or object/item of value offered, promised or provided to another individual or firm or organization in order to gain commercial, contractual, regulatory, or personal advantage.

(e) Fraud: Intentional deception, misrepresentation, concealment or abuse of position intended to obtain an improper financial or other benefit, or to cause loss to the Company or another party

(f) Money Laundering: Any activity intended to conceal, disguise or convert the nature, source, location, ownership or control of proceeds derived from unlawful activity, or to otherwise deal with such proceeds in a manner intended to make them appear legitimate.

(g) Anything of value: Includes money, gifts, hospitality, travel, employment opportunities, favors, discounts, charitable donations, or any other benefit.

1) Gift: A Gift is any tangible item received at any time, as well as any invitation to an event where the inviting party may or may not be present.

2) Entertainment: Entertainment includes all forms of entertainment, including but not limited to any social event, hospitality event, cultural event, concert, charitable event, leisure activity, conference, seminar, marketing event, sporting event or an event of like nature. An event qualifies as Entertainment only if the representative of the inviting party is present (e.g., an ECO Mobility employee).

(h) Third Party: "Third Party" includes any actual or potential customer, supplier, vendor, consultant, agent, adviser, intermediary, distributor, contractor, service provider, business associate, business partner, representative, introducer, lobbyist, or any other individual or organisation with whom the Company interacts or who acts on behalf of the Company.

(i) Public Officials: " Public Official includes any government employee, regulator, officer of

a government-owned entity, political office holder, political candidate, public international organization representative or any person acting in an official governmental capacity."

(j) Facilitation Payments:"A facilitation payment is any payment to a Public Official to expedite or secure the performance of a routine, non-discretionary and legitimate governmental action to which the Company is already entitled, including but not limited to obtaining permits, processing documents, scheduling inspections, or providing utility services. The Company's prohibition on facilitation payments is absolute and applies regardless of the size of the payment or local custom".

(k) Undue Advantage: "Undue Advantage" means any benefit, financial or non-financial, that is not legitimately due and is intended to improperly influence a decision, action or outcome.

(l) Covered Persons: "Covered Persons" means all persons and entities to whom this Policy applies under Clause 2.

4. Policy Statement

4.1 The Company strictly prohibits all forms of bribery and corruption, whether direct or indirect, in dealings with public officials, private entities, or any other stakeholder.

4.2 No employee or third party shall offer, promise, give, solicit, or accept any undue advantage, financial or otherwise, to influence business decisions, secure improper benefits, or obtain or retain business for the Company.

4.3 No Covered Person shall directly or indirectly, through any intermediary or third party, engage in bribery, kickbacks, improper influence, abuse of position, concealment of improper payments, or any arrangement that may reasonably be perceived as intended to obtain an improper business or personal advantage.

4.4 The Company shall not approve, make, receive, or reimburse any payment, gift, hospitality, donation, sponsorship, expense or other transfer of value if the same is, or could reasonably appear to be, intended to improperly influence a decision or outcome.

4.5 Covered Persons are required to exercise sound judgment and remain alert to situations that may create corruption risk or the appearance of impropriety, even if a particular act is not expressly listed in this Policy.

4.6 The Company prohibits fraud, fraudulent misrepresentation, falsification, forgery, embezzlement, misappropriation, concealment of material information, manipulation of records of transactions, and other dishonest acts intended to obtain an improper benefit or cause loss to the Company or any other party.

4.7 The Company prohibits the use of its business, financial systems, accounts, assets or relationships to facilitate money laundering or the concealment or movement of proceeds derived from unlawful activities.

5. Prohibited Conduct

5.1 Eco Mobility Eco Mobility strictly prohibits any form of Bribery & Corruptive business practices whether direct or indirect, in dealings with public officials, private entities or any other stakeholder. All Covered Persons should refrain from receiving or offering, directly or indirectly, any form of gift, entertainment or anything of value from partners/suppliers, or to any government official, commercial partners including customers or their representatives in order to:

(a) Provide or Obtain or retain business;

(b) Influence business decisions; or Secure an unfair advantage or results in an unfair advantage for Eco Mobility

5.2 The following are strictly prohibited:

(a) Offering or accepting bribes, kickbacks, or improper payments;
(b) Making facilitation payments of any amount to any public official for any purpose, regardless of local practice or custom;
(c) Using third parties to make improper payments on the company's behalf;
(d) Offering gifts, hospitality, or expenses that are excessive, inappropriate, or intended to influence decisions;
(e) Bribing public officials, political parties, or candidates;
(f) Falsifying records to conceal improper payments;
(g) retaliating against any person who refuses to engage in prohibited conduct or raises a concern in good faith;
(h) Falsifying invoices, expenses claims or supporting documents;
(i) misappropriation/theft of Company funds or assets;
(j) fraudulent vendor/customer transactions;
(k) manipulation of financial or operational records;
(l) knowingly accepting or processing suspicious/unlawful funds;
(m) structuring or disguising transactions to conceal their source;
(n) using company accounts or business relationships to facilitate unlawful financial activity

No Covered Person shall act as an intermediary in relation to any bribe or kickback, use sham arrangements or inflated commissions to disguise improper payments, or engage in any conduct that creates a reasonable appearance of corruption or unethical business conduct.

6. Gifts, Hospitality, Expenses & Entertainment

6.1 In connection with certain holidays and other occasions, it is customary in many parts of the world to give/receive gifts of nominal value to/from customers, government officials and other parties who have a business relationship with the Company. However, we should be careful that while doing so, we do not violate any regulations or do anything that is contrary to our values. When we make a gift to a customer, a government official or any third party and/or when we receive a gift from employee/vendor/any other external person the following process should be followed:

(a) It is not done to obtain or retain business or gain an improper advantage in ECO's business;
(b) It constitutes a bona fide promotion or goodwill expenditure;
(c) The gift given to be accurately recorded in the Company's books and records;
(d) Gifts or entertainment exceeding ₹500 per individual, whenever received, require prior written approval from the Compliance Officer at legal@ecosmobility.com. Cash or cash equivalents are never permitted.
(e) Gifting is strictly prohibited when used as a Bribe- If refusal of a gift is impracticable or culturally sensitive and may adversely affect business relationships, the matter must be promptly disclosed to the Compliance Officer for determination of the appropriate course, including whether such gift will be retained or returned.

7. Government Interaction and Facilitation Payments

7.1. Dealings with Government Officials and government bodies require heightened care. Covered Persons must be truthful, accurate, transparent, cooperative and courteous in all such interactions, particularly in relation to approvals, permits, inspections, procurement, tax, customs, investigations and regulatory matters. All related payments, approvals, reimbursements and communications must be properly documented and retained.

7.2 Facilitation payments are prohibited. If a payment is made only because of an imminent threat to personal health, safety or liberty, it must be reported to the Compliance Officer immediately not later than 24 Hours, with full details and supporting information available, so that appropriate review, recordkeeping and escalation may be undertaken.

7.3 No Government Official shall be engaged, directly or indirectly, to provide services in relation to matters falling within the scope of that person's official duties, where such engagement is prohibited by law or creates a conflict or appearance of impropriety.

8. Political Contributions

8.1 The Company maintains political neutrality and does not support or endorse any political party, candidate, or political organization.

8.2 The Company doesn't make any direct or indirect political contributions, whether in cash or in kind.

8.3 The Company prohibits the use of corporate funds, assets, or resources for political campaigning or political propaganda. Employees are free to participate in political activities in their personal capacity, provided such activities do not represent the Company or conflict with its interests.

8.4 Engagement with Government bodies, industry associations, chambers of commerce, and trade bodies shall be conducted transparently and solely for legitimate business and policy advocacy purposes.

8.5 Charitable contributions and sponsorships may be made only for legitimate purposes,

with appropriate prior approval, and must not be used to obtain, retain or reward business or influence any regulatory or commercial decision. The recipient and purpose must be appropriately verified and documented, and the contribution or sponsorship must be accurately recorded in the Company's books and records.

9. Third Party Due Diligence

9.1 Eco Mobility recognizes that third parties present a heightened risk of bribery and corruption and therefore applies a risk-based due diligence process prior to engagement and throughout the business relationship.

9.2 The company:

- Conduct appropriate due diligence on all third parties, including suppliers, agents, consultants, distributors, and other intermediaries.
- Embed anti bribery and anti corruption clauses in all new and renewed contracts, including rights to audit and terminate for non compliance.
- Implement contract compliance checklists and risk scoring models to assess corruption risk prior to on boarding.
- Maintain complete and accurate due diligence records for all third parties.

9.3 Third parties who fail to meet the company's anti-corruption standards will not be engaged or retained.

9.4 Persons responsible for engaging or managing Third Parties must act independently and objectively, understand and document the services to be provided, ensure compensation is reasonable and justifiable, obtain appropriate contractual commitments, and conduct ongoing monitoring proportionate to risk

9.5 Red flags requiring enhanced scrutiny include unusual payment structures, excessive commissions, cash requests, offshore or split payments, vague deliverables, lack of qualifications, recommendation by a Government Official, refusal to provide ownership or compliance information, refusal to accept ABAC clauses, and inconsistencies between invoices and actual services.

10. Record Keeping and Controls

10.1 All transactions must be accurately recorded in the company's books and records. Off the books accounts, false entries, or misleading documentation are strictly prohibited.

10.2 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness by the respective functions/owners of the Company. No accounts must be kept "off-book" to facilitate or conceal improper payments.

10.3 No payment shall be approved, made or reimbursed if any part of it is intended for an unlawful or improper purpose or for a purpose other than that described in the supporting documentation. All expenses relating to gifts, hospitality, travel, entertainment, charitable contributions, sponsorships, consultants, intermediaries, Government Official interactions and Third Party payments must be supported by appropriate documentation, approvals and a legitimate business rationale.

10.4 The Company shall maintain appropriate internal financial and accounting controls to identify, prevent and detect improper payments and record keeping irregularities.

11. Fraud Prevention, Detection & Response

11.1 Fraud Prevention

The Company shall maintain appropriate preventive controls to reduce the risk of fraud, including segregation of duties, appropriate authorization and approval controls, access controls, accurate and complete supporting documentation and appropriate oversight of high-risk transactions and activities. Employees and Covered Persons shall comply with established financial, procurement, payment, expense and operational controls and shall not bypass or circumvent such controls without proper authorization

11.2 Fraud Detection

The Company shall maintain appropriate mechanisms to identify and detect actual or suspected fraudulent activities, including financial and control reviews, identification of unusual transactions, anomalies or irregularities, review of high risk transactions and activities, and concerns reported by employees, covered persons or third parties. Any suspected fraud or material financial irregularity shall be promptly escalated through the Company's designated reporting channels.

11.3 Fraud Response

All suspected or reported fraud shall be assessed and, where appropriate, investigated in accordance with the Company's investigation processes. Relevant records, documents and other evidence shall be preserved as appropriate. Where fraud is substantiated, the Company shall take appropriate corrective, disciplinary, contractual, recovery, remediation, and/or legal action, as applicable. The company shall also review relevant controls and implement improvements where necessary to prevent recurrence.

12. Anti Money Laundering

12.1 Prohibition

The Company shall not knowingly facilitate money laundering or use its business, accounts, assets, financial systems or business relationships to conceal, process, transfer or otherwise deal with proceeds derived from unlawful activities.

12.2 Customer and Third-Party Risk

Where appropriate based on the nature and risk of the relationship, the Company shall obtain and maintain relevant information to understand the identity, ownership, legitimate business purpose and nature of transactions involving customers, suppliers, service providers, business partners and other relevant counterparties.

12.3 Transaction Monitoring and Red Flags

Relevant personnel shall remain alert to unusual or potentially suspicious activities, including unusual payment patterns, cash transactions, payments involving unrelated third parties, unexplained refunds, unusual payment destinations, transactions inconsistent with the stated business purpose, or other circumstances that may indicate an attempt to conceal the source or destination of funds.

12.4 Escalation

Any suspected money laundering activity or suspicious transaction shall be promptly escalated to the Compliance Officer or Legal function for appropriate assessment, investigation and action in accordance with applicable laws, regulations and Company procedures.

13. Training and Awareness

13.1 Eco Mobility is committed to maintaining a strong culture of integrity through ongoing training and awareness initiatives.

13.2 Company to deliver mandatory anti-corruption, anti-fraud and anti-money laundering training to all employees upon upon commencement of employment and annually thereafter as part of refresher training.

13.3 Company to provide enhanced, risk based anti-corruption training annually to employees in high risk functions, including but not limited to procurement, finance, sales and business development, senior management, and any roles interacting with government officials.

13.4 Directors and Key Managerial Personnel (KMP) receives annual governance level anti-corruption training tailored to their oversight responsibilities, fiduciary duties, and accountability for maintaining an effective compliance framework.

13.5 Company may also extend training programs to third parties and temporary workers, if it is envisaged that the work profile allocated to them carries a significant risk as per this ABAC Policy.

14. Risk Assessment

14.1 Eco Mobility will conduct periodic anti bribery and anti corruption risk assessments to proactively identify and mitigate risks.

14.2 The risk assessment process

(a) Identify corruption, bribery, and anti competitive risks relevant to the company's operations, markets, and business model.
(b) Assess vulnerabilities within business processes, geographic locations, and third-party relationships.
(c) Evaluate the adequacy and effectiveness of existing controls.
(d) Document outcomes in a formal risk assessment report, including identified risks, mitigating controls, and recommended actions.

14.3 Risk assessments will be reviewed by senior management and updated periodically or when significant changes occur in the business.

14.4 Monitoring of this Policy and the Company's ABAC framework may include compliance reviews, internal audit or sample testing of high-risk transactions, review of gifts and hospitality, Third Party diligence reviews, trend analysis of reported concerns and tracking of corrective actions. High-risk functions, jurisdictions, activities and relationships may be prioritised for such review.

15. Objectives and Targets

ECO Mobility is committed to maintaining high standards of integrity, transparency and responsible business conduct through measurable objectives covering anti-corruption and anti-bribery, fraud prevention and anti-money laundering. The Company shall periodically review progress against these objectives and take appropriate actions where improvement is required.

15.1 Anti-Corruption and Anti-Bribery

(a) Maintain zero tolerance for bribery, corruption, kickbacks, facilitation payments and other improper advantages.
(b) Achieve 100% completion of mandatory anti-corruption and anti-bribery training annually for applicable employees.
(c) Ensure 100% of applicable third parties undergo the prescribed due diligence process before engagement, based on the Company's risk-based requirements.
(d) Conduct and document an annual corruption and bribery risk assessment, with additional review following significant changes in business activities or risk exposure.

15.2 Anti-Fraud

(a) Maintain zero tolerance for fraud, misappropriation, falsification, fraudulent transactions and other financial misconduct.
(b) Ensure 100% of reported material fraud concerns are appropriately assessed and investigated, where investigation is warranted.
(c) Ensure 100% of substantiated fraud cases are assigned appropriate corrective, disciplinary, recovery or remediation actions, as applicable.
(d) Conduct an annual review of fraud risks and relevant preventive and detective controls.

15.3 Anti-Money Laundering

(a) Maintain zero tolerance for knowingly facilitating money laundering or the concealment of proceeds from unlawful activities.
(b) Ensure 100% of applicable employees complete relevant anti-money laundering awareness/training annually, based on their role and risk exposure.
(c) Conduct and document an annual assessment of relevant money laundering risks, with additional review when significant changes occur.
(d) Ensure identified suspicious or potentially high-risk transactions are appropriately reviewed and escalated to the designated Compliance/Legal function.

15.4 Review of Objectives and Targets

Progress against these objectives and targets shall be monitored through the Company's established compliance and management review mechanisms. Where targets are not achieved, appropriate corrective actions shall be identified, assigned and tracked to completion.

16. Commitment

The organization maintains a zero-tolerance approach toward bribery and corruption and is committed to conducting business ethically, transparently.

17. Violations and Action

Violations of this policy may result in disciplinary action, up to and including termination of employment or contracts, as well as potential civil or criminal penalties.

18. Responsibility and Oversight

Compliance officer is responsible for enforcement of this policy. All employees share responsibility for maintaining ethical business practices

19. References

This policy should be read in conjunction with the following policies and procedures:

(a) Whistle Blower Policy
(b) Code of Conduct
(c) It may also be read with such other policies, procedures and controls as may be issued by the Company from time to time in relation to gifts and hospitality, procurement, financial controls, record retention, investigations, disciplinary processes and Third Party due diligence.

20. Oversight and Updates

ECOS (I) MOBILITY & HOSPITALITY LTD.
45 A&B, 1st floor, Corner Market, Malviya Nagar, New Delhi - 110017

This policy will be reviewed Annually and updated as necessary to reflect changes in laws, regulations, or business operations by Audit Committee which would interalia also oversee the adequacy of internal controls relating to anti-bribery and anti-corruption".

"The Company reserves the right to amend, modify or supplement this Policy from time to time, subject to applicable governance and approval requirements."

Frequently Asked Questions (FAQs) – Anti-Corruption & Anti-Bribery Policy

Q1. What should I do if a government official asks for an unofficial payment to expedite a permit, vehicle registration, inspection, or other approval?

Answer:
Do not make the payment. The Company strictly prohibits facilitation payments of any kind. You should immediately report the request to the Compliance Officer and seek guidance before taking any further action.

Q2. Can I accept gifts from a supplier, vendor, customer, or business partner?

Answer:
You may only accept gifts of nominal value that are not intended to influence any business decision. Any gift or entertainment exceeding ₹500 per individual must be disclosed and approved by the Compliance Officer. Cash or cash equivalents must never be accepted.

Q3. A vendor has offered me a personal benefit in exchange for awarding a contract. What should I do?

Answer:
You must refuse the offer immediately and report the matter to the Compliance Officer. Accepting any commission, kickback, personal benefit, or incentive in exchange for business is strictly prohibited.

Q4. Can a driver or chauffeur pay money directly to a traffic official to avoid a challan, vehicle detention, or legal proceeding?

Answer:
No. No employee, driver, or representative of the Company may offer or pay any unofficial amount to a public official. All challans, penalties, and regulatory payments must be processed through lawful and authorized channels only.

Q5. What is considered a bribe?

Answer:
A bribe includes offering, giving, receiving, soliciting, or accepting anything of value, such as money, gifts, hospitality, travel, discounts, favors, employment opportunities, or other benefits to improperly influence a decision or obtain an unfair advantage.

Q6. What should I do if I suspect bribery, corruption, or unethical conduct within the Company or involving a third party?

Answer:
You should promptly report your concerns to the Compliance Officer or through the Company's Whistleblower Mechanism. Reports made in good faith will be treated confidentially and without retaliation.

Q7. Can I engage a vendor or consultant recommended by a government official or customer?

Answer:
Only after completing the Company's prescribed due diligence and approval process. Recommendations from government officials or customers must not influence procurement or vendor selection decisions.

Q8. Are charitable donations, sponsorships, or CSR contributions permitted?

Answer:
Yes, provided they are made for legitimate purposes, receive the necessary approvals, are properly documented, and are not intended to influence any business, regulatory, or commercial decision.

Q9. What records should be maintained for gifts, hospitality, vendor payments, and government interactions?

Answer:
All transactions must be accurately documented, supported by appropriate approvals, and recorded in the Company's books and records. False, misleading, or off-book entries are strictly prohibited.

Q10. What should I do if I am unsure whether an action could violate this Policy?

Answer:
If you are uncertain, do not proceed until you have sought guidance from your reporting manager, Compliance Officer, or Legal Department. When in doubt, always ask before acting.

Guiding Principle

"If a payment, gift, hospitality, favour, or business arrangement would appear inappropriate if disclosed publicly, employees should refrain from proceeding and seek guidance from the Compliance Officer."