

# Global Anti-Corruption Policy

## **\*\*Applicability:\*\***

- The policy applies to all entities within the Flipkart Group and anyone transacting with or on behalf of the Group.
- It adheres to Walmart's Global Anti-Corruption Policy.

## **\*\*Asking Questions and Reporting Violations:\*\***

- Questions about the policy can be directed to the Ethics & Compliance Department or Legal Department.
- Suspected violations can be reported to the Flipkart Group Ethics Helpline through various channels, ensuring confidentiality and the option to report anonymously.

## **\*\*Global Anti-Corruption Policy:\*\***

- Walmart and its subsidiaries are committed to ethical standards and compliance with anti-corruption laws.
- The policy prohibits corrupt payments in any circumstance, whether dealing with government officials or private sector individuals.
- Improper payments, including bribes, are strictly forbidden, and using Walmart funds or assets for illegal, improper, or unethical purposes is prohibited.

## **\*\*Compliance and Violations:\*\***

- Compliance with the anti-corruption policy is mandatory for associates and third parties interacting with government officials on the company's behalf.
- Violations of the policy may result in disciplinary measures, up to and including termination for associates, or termination of business relations for third parties. Law enforcement authorities may also be involved.

## **\*\*Global Implementation of Anti-Corruption Program:\*\***

- Walmart maintains a Global Anti-Corruption Program to prevent, detect, and remediate bribery and recordkeeping violations.
- Specific procedures and governance are outlined, including controls on fund disbursement, accurate record-keeping, standards of behavior, training, corruption risk assessments, due diligence of third parties, and more.

**\*\*Reporting:\*\***

- Associates and third parties are encouraged to report any violations or potential violations of the policy or related procedures to Global Ethics and Compliance.
- Reports to Ethics & Compliance are treated confidentially, and anonymous reporting is allowed to the extent permitted by law.

**\*\*Conclusion:\*\***

- The document emphasizes the importance of ethical behavior, compliance with anti-corruption laws, and a commitment to preventing corrupt practices within the Flipkart Group.