

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Scope and applicability

This Anti-bribery and Anti-corruption Policy (this “Policy”) applies to all individuals worldwide working for all affiliates and subsidiaries of Yatra Online Limited (“YOL” or “Company”) at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary).

2. Policy details

A bribe is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe. It is also a separate offence to bribe a government/ public official. “Government/ public official” includes officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind in a country or territory.

3. Gifts and hospitality

Employees or members of their immediate families (spouse, mother, father, son, daughter, brother, sister or any of these step- or in-law relationships, whether established by blood or marriage including common law marriage) should not provide, solicit or accept cash or its equivalent, entertainment, favors, gifts or anything of substance to or from competitors, vendors, suppliers, customers or others that do business or are trying to do business with YOL. Loans from any persons or companies having or seeking business with YOL, except recognized financial institutions, should not be accepted. All relationships with those who YOL deals with should be cordial, but must be on an arm’s length basis. Nothing should be accepted, nor should the employee have any as mentioned aforesaid.

4. What is not acceptable?

It is not acceptable for any employee of YOL (or someone on his / her behalf) to:

- a. Accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with YOL;
- b. Give, promise to give or offer, any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given;
- c. Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure;
- d. Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them;
- e. Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy;
- f. Engage in any activity that might lead to a breach of this Policy.

The points stated above are illustrative in nature and in no way intend to limit the applicability of this

5. Willful blindness

If an employee willfully ignores or turns a blind eye to any evidence of corruption or bribery within his / her department and/or around him / her, it will also be taken against the employee. Although such conduct may be “passive”, i.e. the employee 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.

6. Business relationships

YOL expects all Third Parties doing business with YOL to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. YOL requires all Third Parties to cooperate and ensure compliance with these standards, to continue the business relationship.

7. Protection

Those who refuse to accept or offer a bribe or those who raise concerns or report another’s wrong-doing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place as per the terms & condition of the Policy.