

Lenskart Solutions Limited

(Earlier known as Lenskart Solutions Private Limited)

Corporate Office: Ground Floor, Vipul Tech Square,
Golf Course Road, Sector- 43, Gurugram, Haryana 122009



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Version

Version	Approved in	Description
Version 1	October 2025	Original Policy

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LENSKART GROUP - ANTI BRIBERY POLICY & ANTI CORRUPTION POLICY

Corruption and bribery undermine ethical business practices, distort fair competition, damage reputations, and expose organizations and individuals to significant legal and financial risks. These acts not only violate laws but also erode trust among stakeholders, including customers, partners, regulators, and the communities in which we operate. Lenskart is committed to complying with all applicable anti-bribery and anti-corruption laws and regulations in the jurisdictions where it operates. Lenskart is committed to complying with all applicable anti-bribery and anti-corruption laws and regulations in the jurisdictions where it operates, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and other relevant local anti-corruption and anti-fraud legislation.

Any form of bribery, corruption, fraudulent conduct, or unethical behavior is strictly prohibited under this policy. This includes offering, giving, soliciting, or accepting any improper advantage, whether directly or indirectly, to influence a business decision or secure an unfair benefit. Fraudulent acts, such as misrepresentation or intentional concealment of material facts with the intent to deceive or cause harm, are punishable under relevant laws and subject to disciplinary action within the organization.

Lenskart is dedicated to conducting its business with integrity, fairness, and transparency, and to fostering a culture that encourages ethical decision-making and accountability at all levels of the organization. We believe that ethical conduct and compliance with anti-bribery and anti-corruption laws are fundamental to sustainable business success and the protection of our reputation. Accordingly, Lenskart has adopted a “Zero Tolerance” approach towards bribery and corruption in all its forms.

Scope & Applicability

This policy applies to the entire Lenskart Group, including Lenskart Solutions Limited, its subsidiaries, and joint ventures where it holds a majority stake. It is binding on all individuals associated with the Group, including Directors, employees (whether full-time, part-time, temporary, adhoc, or on contract), trainees, as well as vendors, suppliers, contractors, consultants, service providers, and any other external parties acting for or on behalf of the Lenskart or any of its subsidiaries or joint ventures, regardless of their location (collectively referred to as “**Designated Person**” within this policy).

The purpose of this policy is to safeguard and promote legitimate business practices across Lenskart by preventing and prohibiting corruption, bribery, and similar unethical conduct in connection with its operations. To ensure effective implementation, Lenskart will communicate this policy along with the associated procedures and its overall approach to all Designated Persons and will make it publicly available on its corporate website. Compliance with this Anti-Bribery Policy is mandatory for all Designated Persons and forms an integral part of Lenskart’s Code of Conduct, Whistleblower Policy and other relevant policies.

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Anti-Bribery & Corruption

Under no circumstances shall any Designated Person **offer, promise, provide and receive** anything of value (monetary or non-monetary) to/from:

1. Any Government officials;
2. Any individual or members of their family;
3. Any Third parties (Any contracted or non-contracted party);
4. Charitable organizations recommended by any such recipients;
5. Prospective customers, in the form of rebates or other inducements;
6. Or any other entity and/or individual, directly or indirectly related and having a conflict of interest with.

Accepting Gifts and Entertainment

Designated persons shall not accept gifts, entertainment, or anything of value from current or prospective customers, vendors, suppliers, or any other entities or individuals who are directly or indirectly related to the Company and may have an actual or perceived conflict of interest.

Designated persons must never accept a gift or benefit in circumstances that could compromise or appear to compromise their impartial business judgment. They are also prohibited from accepting, or permitting close family members (including spouse, parent, child, sibling, or any other relative) to accept, gifts, services, or preferential treatment in exchange for past, current, or potential business with the Company.

1. Prohibition on Cash or Cash-Equivalent Gifts: Receiving gifts in the form of cash or cash equivalents (including gift cards, vouchers, coupons, prepaid cards, or similar instruments) is strictly prohibited under all circumstances.
2. Non-Cash Gifts: Non-cash gifts may be accepted only if:
 - a. They are permitted under applicable law; and
 - b. They are nominal in value, not exceeding USD 25 (or equivalent local currency); and
 - c. They are appropriate, customary, and reasonable, such as occasional non-lavish business meals or small tokens (e.g., diaries, stationery, or inexpensive food items) that reflect standard business hospitality.
3. Disclosure and Approval: Any non-cash gift received by a designated person must be promptly disclosed to their Department Head or the Group General Counsel. The Department Head or Group General Counsel shall review and decide whether the gift may be retained, shared, returned, or otherwise disposed of in accordance with Company policy.

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Prohibition on Offering Improper Benefits to Contracting Parties

No Designated Person shall offer, promise, or provide any money, cash gift, or cash equivalent (including gift cards, vouchers, or tickets) to any existing or potential contracting party including their employees, agents, or representatives with the intent to secure personal advantage or improperly influence a business decision for individual or organizational gain.

This prohibition applies to both direct personal benefits and indirect benefits, such as favorable treatment for relatives, associates, or entities in which the designated person has a personal interest. Political contributions are strictly prohibited.

1. Cash gifts or cash equivalents are strictly prohibited under all circumstances.
2. Non-cash gifts of modest value not exceeding USD 25 (or equivalent local currency), which are customary, reasonable, and non-lavish, may only be offered after obtaining prior written approval from the designated person's Department Head or the Group General Counsel. Any such approved gift must be properly documented and disclosed in accordance with this Policy.
3. Any action beyond this limited exception constitutes a violation of this Anti-Bribery Policy, regardless of the value of the benefit offered.
4. Charitable contributions may only be made after conducting due diligence on the recipient organization and obtaining prior written approval from the Group General Counsel.

Responsibility

All stakeholders associated with Lenskart, including every Designated Person, are expected to uphold the principles of this Policy as part of their ethical and professional responsibilities. Cash gifts or cash equivalents (such as gift cards, vouchers, or other monetary substitutes) are strictly prohibited. If a non-cash gift within the approved nominal limit of USD 25 (or equivalent local currency) is to be accepted or provided, the Designated Person must:

1. Complete the Gift Disclosure & Approval Form (Annexure-I), and
2. Submit the completed form to both their Head of Department and the Group General Counsel for review and written approval before offering or accepting the gift, or, where advance disclosure is impractical, within two (2) business days of receipt.

Any gift that does not comply with these requirements, or any failure to disclose and obtain approval as set out above, will be treated as a violation of this Policy and may result in disciplinary action.

Breach of Policy

The breach of this Policy by the Designated person of the Company shall lead to appropriate actions against such persons. After completion of the investigation, due & appropriate action, which could include administrative action, disciplinary action, civil or criminal action or closure of the matter (if it is proved that no such breach is committed etc.) depending upon the outcome of the investigation.

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Continuous Improvement & Review

This policy shall be periodically reviewed and updated if there are significant changes in the applicable regulations. This policy draws from the Code of Conduct and Whistleblower Policy of the company. In case of any discrepancies found in the policy, the relevant portions of the Code of Conduct and the Whistleblower policy should be the standard. Awareness on this policy will form part of the induction process where if required, employees will receive relevant inputs on how to implement and adhere to this Policy.

Training and Awareness

Awareness and training on the requirements associated with this Policy shall be mandatory and shall be conducted either during the induction of all new employees or at least once every year for all employees, including trainees and third-party employees. These training and awareness sessions shall be organized and coordinated by the HR Department.

For external persons among designated persons such as contractors and their employees, consultants, or any other person associated with Lenskart adherence to this Policy shall be incorporated into the applicable contract documents, ensuring that their compliance obligations are contractually enforceable.

Channel of Complaint

Complaints may be made by any designated person, as well as by others acting on behalf of the Company, including directors, financial and legal consultants, corporate agents, brokers, suppliers/vendors, consultants, advisors, contractors, or other third parties. Complaints can be submitted via email or in writing through a letter addressed to Group General Counsel.

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Annexure-I

Gift Disclosure & Approval Form

(For accepting or providing gifts within the limit of USD 25 / equivalent local currency)

1. Employee / Requestor Details

Name: _____

Employee ID: _____

Department: _____

Designation: _____

Email / Phone: _____

2. Gift Details

Type of Request: Accepting a Gift Providing a Gift

Gift Description: _____

Estimated Value (USD / Local Currency): _____

Date Gift Received / Offered: _____

Occasion / Reason: _____

Recipient or Giver Name & Organization: _____

Relationship to Company:

(e.g., Vendor, Customer, Consultant, Prospective Partner) _____

3. Compliance Confirmation (to be checked by Requestor)

I confirm that this is a non-cash gift.

I confirm that the gift value does not exceed USD 25 (or local equivalent).

I confirm that the gift is customary, reasonable, non-lavish, and not intended to improperly influence any business decision.

I confirm that the gift does not violate any applicable laws or the company's Anti-Bribery & Corruption Policy.

4. Approval Section

Department Head/Group General Counsel Decision:

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Approved Not Approved

Name & Signature: _____

Date: _____