



VERSION 1.0

ANTI- CORRUPTION AND ANTI- BRIBERY POLICY

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Private Limited**

DOCUMENT CONTROL SHEET

Document History

Version No.	Release Date	Policy / Description of Change	Prepared/ Revised by	Reviewed By	Approved By
1.0	01/04/2021	Anti- Corruption and Anti- Bribery Policy	Head- Legal and Secretarial	Head-Corporate Functions	Head- Corporate Functions

ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

OBJECTIVE

Servify Group is committed to protect its reputation, revenues, assets and information from Corruption, Bribery, fraud, deceit or other improper conduct by the Stakeholders. Servify Group is equally committed to the prevention, deterrence and detection of Bribery and other corrupt business practices by its Stakeholders. This includes compliance with all applicable laws (both domestic and foreign), prohibiting improper payments, gifts or inducements of any kind to or from any person, including officials in the private or public sector, customers and suppliers. All Stakeholders are required to act professionally, fairly and with integrity in all the business dealings and relationships wherever the Servify Group operates. Servify Group has, therefore, adopted this Anti-Corruption and Anti-Bribery Policy (“**ACAB Policy**”) to counter Corruption and Bribery at all levels by its Stakeholders.

Servify Group is subject to various anti-bribery and anti-corruption laws, including the (Indian) Prevention of Corruption Act 1988, as amended by the Prevention of Corruption (Amendment) Act, 2018, the U.S. Foreign Corrupt Practices Act, 1977, the UK Bribery Act, 2010 and other laws that apply in the various jurisdictions where Servify Group has its business operations. Accordingly, the purpose of the ACAB Policy is to ensure that adequate procedures and mechanisms have been established by the Company to prevent the involvement of the Company, its Subsidiaries and/or Stakeholders in any activity relating to Corruption, Bribery, Facilitation Payments or Kickbacks even where the involvement may be unintentional.

This ACAB Policy, therefore, sets out the information, guidance and compliance relating to the prohibition, recognition, reporting, and investigation of suspected Corruption, Bribery, fraud, deceit, or other improper conduct by its Stakeholders. The ACAB Policy emphasizes the Company’s zero tolerance approach to Corruption and Bribery. Accordingly, the key objectives of the ACAB Policy are, *inter alia*, to:

- guide the Stakeholders to act professionally, fairly and with utmost integrity in all business dealings and relationships, wherever Servify Group operates;
- encourage the Stakeholders to act honourably and with integrity in all business dealings of the Company and its Subsidiaries;
- identify and address appropriately any potential conflicts of interest;
- initiate steps to ensure that no financial or other inducements are offered or accepted by or on behalf of the Company and/or its Subsidiaries;
- encourage the Stakeholders to be vigilant and to act diligently in good faith;
- monitor and investigate instances of alleged corruption by any Stakeholder(s);
- take action against any Stakeholder(s) involved in corruption;
- minimize the risk of involvement of all Stakeholders in corruption related activities;
- provide advice, information and training on ethics to all the Stakeholders at all levels and locations;
- maintaining accurate documentation and records of any and all transactions entered into by or on behalf of the Company and/or the Subsidiaries;

- reporting information to the Compliance Officer and the Executive Leadership as advisable by this ACAB Policy; and
- cooperating with any investigations /reviews conducted the Compliance Officer and the Executive Leadership concerning violations or suspected violations of this ACAB Policy.

The ACAB Policy supplements the Servify Policies and should be read in conjunction with: (i) the Servify Policies; (ii) any guidance published pursuant to the ACAB Policy; and (iii) any other relevant policies as may be implemented by Servify Group from time to time.

DEFINITIONS

In this ACAB Policy, the defined terms will have the following meaning:

- (i) “**ACAB Policy**” means this Anti-Corruption and Anti-Bribery Policy adopted by Servify Group;
- (ii) “**AML Policy**” means the Anti-Money Laundering Policy adopted by Servify Group;
- (iii) “**Bribe**” or “**Bribery**” means the offering, promising, giving, receiving, soliciting or accepting of an undue advantage, financial or otherwise, or any other thing of value, or any attempt to do any of the foregoing, with the intention of influencing or rewarding the behaviour of a person in a position of trust to perform a public, commercial or legal function to obtain or retain a commercial advantage. Bribes are payments (or promises of payments) made in the form of money or anything else of value such as, providing lavish/inappropriate gifts, hospitality and entertainment, inside information, or sexual or other favours; offering employment to a relative; underwriting travel expenses; abuse of function; or other significant favours in return for a business favour or advantage. Bribery includes advantages provided directly, as well as indirectly through an intermediary;
- (iv) “**Chief Financial Officer**” means the Chief Financial Officer appointed by the Company;
- (v) “**Chief Operating Officer**” means the Chief Operating Officer appointed by the Company;
- (vi) “**Code of Conduct**” means the Code of Conduct adopted by Servify Group;
- (vii) “**Company**” means Service Lee Technologies Private Limited;
- (viii) “**Compliance Officer**” means an employee of sufficient seniority, competence and independence designated by the Company as such to ensure compliance with the provisions of this ACAB Policy, and the Head - Legal and Secretarial is currently designated as the Compliance Officer;
- (ix) “**Corruption**” includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral, or incompatible with ethical standards, such as misuse of public office or power for private gain or misuse of private power in relation to business outside the realm of government
- (x) “**Directors**” means every director, both former and current, of Servify Group;
- (xi) “**Employees**” means every employee, both former and current, whether full time or part time, of Servify Group (whether working in India or abroad);
- (xii) “**Equal Opportunity Policy**” means the Equal Opportunity Policy adopted by Servify Group;

- (xiii) “**Executive Leadership**” means the Founder/ Chief Executive Officer, the Chief Financial Officer, the Chief Operating Officer and the Head- Strategy, Head-Corporate Functions;
- (xiv) “**Facilitation Payments**” are unofficial payments made to public officials in order to secure or expedite the performance/ non-performance of a routine or necessary action and may also be referred to as 'speed' money or 'grease' payments or ‘good-will money’;
- (xv) “**Founder/ Chief Executive Officer**” means Mr. Sreevathsa Prabhakar;
- (xvi) “**Government Official**” means and includes the following: (a) any person holding a legislative, executive or administrative office of the government (domestic or foreign), or acting in the official capacity for or on behalf of a legislative, executive, or administrative office of the government (domestic or foreign), whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person’s seniority; (b) any person in the service or pay of the government or of a corporation established by or under a central, provincial or state statute, or an authority or a body owned or controlled or aided by the government or a government company or is remunerated by the government by fees or commission for the performance of any public duty; (c) any judge, including any person empowered by law to discharge, whether by himself/herself or as a member of any body of persons, any adjudicatory functions; (d) any person authorised by a court of justice to perform any duty, in connection with the administration of justice, including a liquidator, receiver or commissioner appointed by such court; (e) any person who performs a public duty, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the country and as applied in the pertinent area of law; and (f) any other person defined as a “government official” under the domestic or foreign law.
- (xvii) “**Head-Corporate Functions**” means the Head-Corporate Functions appointed by the Company;
- (xviii) “**Head- Strategy**” means the Head- Strategy appointed by the Company;
- (xix) “**Kickbacks**” means and includes payments made in return for a business favour or advantage;
- (xx) “**Servify Group**” means, collectively, the Company and the Subsidiaries;
- (xxi) “**Servify Policies**” means all the policies adopted by Servify Group for its Stakeholders from time to time, including but not limited to, the Code of Conduct, the Third Party Code of Conduct, the ACAB Policy, the AML Policy, the Whistleblower Policy, and all other policies as adopted by Servify Group from time to time;
- (xxii) “**Stakeholders**” means and includes Employees, Directors, consultants, contractors, suppliers, service providers, sales representatives, channel partners (including dealers), distributors and agents, lenders, customers, business associates, trainee and others with an interest or concern in the business of the Company and/or the Subsidiaries or with whom the Company and/or the Subsidiaries has any financial or commercial dealings, and the term “**Stakeholder**” will be construed accordingly;
- (xxiii) “**Subsidiaries**” will have the meaning ascribed to it under the (Indian) Companies Act, 2013, and includes ServiceLee Techsystem Solutions Private Limited, ServiceMart Technologies Private Limited, Servify (US), Inc., Servify (Canada) Inc., Servify (Europe), B.V., Servify Technology (Shenzhen) Co., Ltd., Servify UK Limited, Servify Middle East FZE, Servify Australia Pty. Ltd., Servify Turkey Technology Services Trade Limited (Servify Teknoloji Servicleri Tic Ltd Sti), Servify Hongkong Ltd., Servify (Singapore) Pte. Ltd. Servify Technology Solutions LLC, Service Lee Sigorta ve Reasürans Brokerliği

Limited Şirketi and Saudi Arabia for Telecom & IT, and includes any other subsidiary as may be established by the Company from time to time;

(xxiv) “**Third Party Code of Conduct**” means the Third Party Code of Conduct adopted by Servify Group;

(xxv) “**Whistleblower Policy**” means the Whistleblower Policy adopted by Servify Group.

SCOPE

The ACAB Policy essentially covers: Bribes; Gifts, Hospitality and Entertainment; Facilitation Payments and Kickbacks; political contributions; charitable contributions; preferential hiring and mergers and acquisitions. The ACAB Policy constitutes a minimum standard of compliance. This ACAB Policy must be complied with in any country in which Servify Group does business, directly or through any of its Subsidiaries, even when the ACAB Policy is stricter than the anti-bribery and anti-corruption laws that are applicable, including both applicable local laws and those laws with extra-territorial application. However, when the applicable anti-bribery and anti-corruption laws are stricter than the ACAB Policy, the relevant Stakeholder must comply with those laws. In case of any doubts, the concerned Stakeholder must contact the Compliance Officer.

APPLICABILITY

All Stakeholders are required to comply with the ACAB Policy and its implementing procedures, which are designed to promote compliance with the applicable anti-bribery and anti-corruption laws in all jurisdictions in which Servify Group operates in. The Stakeholders must ensure that the Servify Group’s procedures and measures to combat anti-bribery and anti-corruption risks and threats are upheld and strengthened. If in doubt whether an act would breach this ACAB Policy, on the applicability of this ACAB Policy, or if an act could be perceived to be a breach of this ACAB Policy, such Stakeholder must consult the Compliance Officer.

GENERAL GUIDELINES

(1) *Bribery*

Servify Group conducts its business lawfully and ethically and expects all Stakeholders to conduct the business with integrity regardless of the existence of any local customs or traditions that may question integrity. The ACAB Policy prohibits all forms of Corruption, including Bribery, by its Stakeholders, whether involving, directly or indirectly, Government Officials or a private individual or company.

Accordingly, the Stakeholders cannot directly or indirectly:

- (i) offer, promise, pay or authorize an offer, promise or payment of money or anything of value, including a Bribe, employment opportunity, donations to charitable organisation or sponsorships, to a Government Official or any other person or entity (including in the private sector), which is intended to: (a) influence the judgment of the recipient in exercising his or her job responsibilities; or (b) get business or secure any advantage or preferential treatment or an improper advantage for the Company and/or its Subsidiaries; or (c) gratification for the recipient having made a decision or acted in a way that benefited the Company and/or Subsidiary;
- (ii) request or accept any money or item of value, which is: (a) intended to influence the judgment or conduct of a Stakeholder in his or her job responsibilities, or (b) intended

as gratification for a decision or act in a way that benefits the person or entity giving the item of value;

- (iii) pay or accept any sort of Bribe from customers, suppliers, politicians, Government Official, for or on behalf of the Company and/or its Subsidiaries for or in respect of any business or official matters or transactions of the Company and/or its Subsidiaries; or
- (iv) request or accept any Bribes, Kickbacks or other improper benefits.

(2) *Facilitation Payments and Kickbacks*

- (i) All Facilitation Payments and Kickbacks are corrupt payments, and any such payment during conduct of, or in connection with, or in relation to, the business by Servify Group is strictly prohibited. All Stakeholders must avoid any activity that may lead to or suggest that a Facilitation Payment or Kickback will be made or accepted by the Company and/or its Subsidiaries.
- (ii) If any Stakeholder is asked to make a payment on behalf of the Company and/or its Subsidiaries, he/she should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Such Stakeholder should always ask for a receipt that details the reason for the payment. In case of any suspicion, concern or query regarding a payment, raise these with the Compliance Officer without delay or hesitation.
- (iii) The ACAB Policy also prohibits improper/ unethical payments to Government Officials, and any payment or benefit conveyed to a Government Official must be fully transparent, properly documented, and accounted for.

(3) *Gifts, Hospitality and Entertainment*

- (i) The Stakeholders are strictly prohibited from giving or receiving of gifts or favours to or from anyone (including but not limited to, any customers or potential customers, Government Official, political party, candidate for political office or any vendor or intermediaries, such as agents, attorneys or consultants) in an effort to sell products or services or to influence business, labour or governmental decision making. Further, meals and entertainment expense incurred in an effort to sell products or services or to influence business, labour or governmental decision-making is strictly prohibited. Further, any gifts, favours or any hospitality in form of meals and entertainment is also prohibited to family members or close business associates of a Government Official.
- (ii) Stakeholders are also prohibited from offering gifts or granting favours outside the ordinary course of business to current or prospective customers, their employees or agents or any person (including but not limited to Government Officials) with whom the Company, the Subsidiaries and/or their business associates have a contractual relationship or intend to negotiate an agreement. No Stakeholder should accept or solicit any personal benefit from anyone in the course of business in a manner that might compromise or appear to compromise their objective assessment.
- (iii) Notwithstanding the foregoing, the giving or receiving of gifts or hospitality may be acceptable if it meets all the following requirements:
 - (a) it is *bona fide* and made in the normal course of business and does not create

- the appearance (or an implied obligation) that the gift giver is entitled to preferential treatment, an award of business, better prices, or improved terms of sale or service;
- (b) it complies with all applicable anti-bribery and anti-corruption laws and customs of the relevant jurisdiction (including cultural and religious festivals) and is not prohibited under applicable law;
 - (c) it would not influence, or appear to influence, or cause a conflict of interest for the gift giver or receiver;
 - (d) it does not include cash or a cash equivalent (such as gift certificates or vouchers), gold or other precious metals, gems or stones;
 - (e) it does not include any form of services or non-cash benefits such as promise of employment
 - (f) it is of an appropriate type and value and given at an appropriate time;
 - (g) it is fully documented and supported by original receipts and accurately recorded in the books of accounts; and
 - (h) it is given openly, not secretly, and in a manner that avoids the appearance of impropriety.

For the purposes of sub-clause (f), the value of the gift, hospitality and entertainment will need to comply with the Section 8 of the Code of Conduct. If the value of the gift, hospitality and entertainment is beyond the threshold specified in Section 8 of the Code of Conduct, the Employee/Directors/Consultant will require the prior permission of the regional head.

Further, any Stakeholder who makes, or receives an offer of, gifts or favours, to or from Government Officials or representatives, politicians or political parties, other than as mentioned above will require approval of the region.

(4) *Political Contributions*

Servify Group or its Stakeholders are not permitted to make donations on behalf of the Servify Group, whether in cash or kind, in support of any political parties or candidates, in India or elsewhere, as this can be perceived as an attempt to gain an improper business advantage.

(5) *Charitable contributions*

The Company and/or the Subsidiaries may make charitable donations that are legal and ethical under applicable local laws and practices. No donation must be offered or made by any Stakeholder on or behalf of the Company and/or its Subsidiaries without seeking the prior opinion of the Compliance Officer. Stakeholders may, in their personal capacity, make donations that are legal and ethical under applicable local laws and practices. It is recommended that all such donations or contributions are documented with a receipt.

(6) *No Preferential Hiring*

The Stakeholders cannot offer or promise employment or internship to, or hire, relatives of any Stakeholder or Government Official in the Servify Group for the purpose of improperly influencing their decision-making.

(7) *Mergers and Acquisitions*

A company that does not perform adequate due diligence regarding compliance with anti-bribery and anti-corruption procedures of the target company prior to a merger or acquisition

may face both legal and business risks. Servify Group must undertake appropriate and reasonable anti-corruption and anti-bribery due diligence prior to entering into a joint venture, or entering a new market, and in connection with every merger or acquisition.

(8) *Books, Records, And Internal Control Requirements*

The books and records of Servify Group must correctly reflect the true nature of all business transactions. The Stakeholders must submit accurate and complete travel and expense reports, financial statements, customer billing, and other records as may be required by the Servify Group in accordance with the Servify Policies from time to time. Servify Group will retain all documents related to the transaction for/on behalf of them will be kept in accordance with applicable law and the record retention policy of Servify Group.

POTENTIAL RED FLAGS

The Company encourage openness and will support anyone who raises genuine concerns in good faith under this ACAB Policy, even if they turn out to be mistaken. The following is an illustrative list (but not an exhaustive list) of possible red flags that may arise during the course of conducting business which may raise concerns under various antibribery and anti-corruption laws and under this ACAB Policy (each, whether or not listed herein, a “**Red Flag**”):

- The Stakeholder becomes aware that a third party engages in, or has been accused of engaging in, improper business practices;
- The Stakeholder learns that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a “special relationship” with Government Officials or officials involved in the licence application process;
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract with for the Company and/or the Subsidiaries, or carrying out a government function or process for the Company and/or the Subsidiaries;
- A third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business;
- A third-party requests and unexpected additional fee or commission to “facilitate” a service;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiation or provision of services;
- A third-party request that a payment is made to “overlook” potential legal violations;
- A third-party request that the Stakeholder provides employment or some other advantage to a friend or relative;
- The Stakeholder receives an invoice from a third party that appears to be non-standard or customized;
- A third party insists on the use of side letters or refuses to put terms agreed in writing;
- The Stakeholder notices that the Company or the Subsidiary has been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- A third-party request or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to the Company and/or the Subsidiaries;
- The Stakeholder is offered an unusually generous gift or offered lavish hospitality by a third party; or
- A Government Official suggests a contribution should be made to his favourite charitable

organisation and in return he would be able to influence the decision-making process.

REPORTING PROCESS

The Stakeholders are encouraged to raise/report any concerns or suspicion they have about any Corruption, Bribery, Facilitation Payments, Kickbacks, malpractice or any case of corrupt practice, or any breach of this ACAB Policy and/or applicable anti-bribery or anti-corruption law (whether actual or suspected) at the earliest possible stage. If any Stakeholder is unsure whether a particular act constitutes Bribery, Corruption, Facilitation Payments, Kickbacks or any malpractice or corrupt practice or any breach of this ACAB Policy and/or applicable anti-bribery or anti-corruption law (whether actual or suspected) or if has any other queries, the same should also be raised in writing to the concerned reporting manager or the Compliance Officer at complianceofficer@servify.tech. The Stakeholders may also report any concerns, suspicion or queries regarding any Corruption, Bribery, Facilitation Payments, Kickbacks, malpractice or any case of corrupt practice, or any breach of this ACAB Policy and/or applicable anti-bribery or anti-corruption law (whether actual or suspected) ACAB Policy anonymously under the Whistleblower Policy.

INVESTIGATION AND PENALTIES

All instances of Bribery, Corruption, Facilitation Payments, Kickbacks malpractice or any breach of this ACAB Policy or applicable anti-bribery or anti-corruption law (whether actual or suspected) identified and reported by a Stakeholder will be promptly and appropriately investigated as discussed below, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with Servify Policies and/or applicable law.

In case the reporting manager receives any report from a Stakeholder, the same will be reported to the Compliance Officer. The Compliance Officer will, thereafter, carry out preliminary investigation. Based on the findings of preliminary investigation report, the Compliance Officer will decide on the further course of action, including escalating the matter to the Executive Leadership. Basis an initial assessment of the report received from the Compliance Officer; the Executive Leadership may launch a formal investigation process. In case the investigation by the Compliance Officer along with the Executive Leadership leads to a conclusion that the delinquent Stakeholder has committed an offence or a breach of any applicable law or regulation that could cause substantial harm to any other Stakeholder(s) of Servify Group or the general public, the Executive Leadership will also determine and decide whether an immediate notification to the appropriate authority (such as, the police) is required.

If the charges are proved upon investigation, the delinquent Stakeholder will be subject to corrective or disciplinary actions in accordance with applicable laws and Servify Policies. In case of Employees and Directors, any violation of this ACAB Policy or applicable anti-corruption and anti-bribery laws may result in suspension of employment without pay, reduction in salary, demotion, monetary penalty dismissal/termination of employment or legal action. In case of other Stakeholders, any violation of this ACAB Policy or applicable anti-corruption and anti-bribery laws may result in suspension or termination of contractual/business relationship, initiation of legal action and/or any other legal and remedial actions available to Servify Group under applicable law.

The Company, its Subsidiaries and/or its Stakeholders may also be investigated by government regulators in different jurisdictions and, depending on the circumstances, prosecuted administratively, under civil law or under criminal law, which could result in severe fines and penalties, debarment and/or imprisonment if a violation of applicable anti-bribery and corruption laws and regulations is established. Any punishment(s) imposed by any regulator against any defaulting Stakeholder for violating any anti-corruption and anti-bribery laws are against a defaulting Stakeholder are as an individual and may include imprisonment, probation, and/or monetary fines which will not be paid by Servify Group.

STAKEHOLDER PROTECTION

Any Stakeholder who refuses to accept or offer a bribe, or those who raise concerns or report another's wrong doing under this ACAB Policy are sometimes worried about possible repercussions. Servify Group is committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in Bribery or Corruption, or because of reporting in good faith their suspicion that an actual or potential Bribery or other Corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Any such detrimental treatment faced by a Stakeholder must be reported immediately to the Compliance Officer.

RESPONSIBILITIES OF STAKEHOLDERS

The Stakeholders are solely responsible to abide by the ACAB Policy and to restrict their actions/conduct within the set framework of the ACAB Policy. The Stakeholders must ensure that they have read and understood this ACAB Policy and must comply with the terms and conditions of this ACAB Policy. As the prevention, detection and reporting of Bribery or other forms of Corruption are responsibility of all the Stakeholders, each Stakeholder must: (i) be alert to warning signs in relation to Bribery and Corruption; (ii) report actual or suspected violations of this ACAB Policy; (iii) report any evidence that an agreement or arrangement with a third party lacks business integrity; (iv) report any direct or indirect approach that involves any activity relating to Bribery or Corruption; and (v) co-operate with any investigation or audit activities relating to matters covered by this ACAB Policy. Any violation of this ACAB Policy (including a failure to report a breach, co-operate with audit, or perform adequate due diligence) will be regarded as a serious matter and will result in remedial/disciplinary action, including termination of relationship with such Stakeholder.

IMPLEMENTATION, REVIEW AND MONITORING

The Executive Leadership along with the Compliance Officer will oversee the implementation and monitoring of the ACAB Policy regularly. The Executive Leadership will submit a report to the Board of Directors of the Company on a half yearly basis regarding the number of the reports/queries received in the preceding six months, including the action taken on such reports/queries and outcome /results/status of investigations, if carried out.

The ACAB Policy will be reviewed by the Executive Leadership along with the Compliance Officer annually or as may be required by applicable laws.

DISSEMINATION OF POLICY AND TRAINING

The ACAB Policy will be made available on the website and intranet of the Servify Group. Servify Group will provide training to the Stakeholders as per applicable laws. .

DOCUMENT RETENTION

All documents related to queries, reporting, investigation and enforcement pursuant to this ACAB Policy, will be kept in accordance with applicable law and the record retention policy of Servify Group.

ADOPTION AND AMENDMENTS

This ACAB Policy has been adopted by Servify Group with effect from April 1, 2021.

This ACAB Policy may be modified, amended or repealed at any time by the Company and will be adopted and implemented by Servify Group accordingly.

