

# **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

## 1. OBJECTIVE

**Raminfo Limited's** core commitment is to operate according to the highest ethical standards, stating *“We are resolutely dedicated to conducting our business with integrity, adhering strictly to moral and ethical principles. Our zero-tolerance stance on bribery and corruption in any form is fundamental to all our operations and business practices.”*

**Raminfo Limited** is committed to maintaining the highest levels of integrity, fairness, and professionalism across all areas of its business operations. The Company has implemented a robust anti-bribery and anti-corruption policy and is dedicated to adopting effective measures to prevent unethical behavior. This includes full compliance with relevant local, National and International laws that prohibit improper payments, gifts, or incentives—whether involving public officials, private individuals, clients, or suppliers.

The goal of this Anti-Bribery and Anti-Corruption Policy (“**ABAC Policy**”) is to set the principles and outline the necessary steps to prevent bribery, facilitation payments, and corrupt practices in relation to the Company's activities.

All personnel at **Raminfo Limited** must be vigilant in identifying any suspicious transactions, behavior, or activities. They are required to adhere to this Policy by reporting such instances and strictly following the procedures for handling and addressing them. Supervisors and managers are responsible for ensuring that their teams understand and comply with these obligations. Any violation of this Policy could result in disciplinary action, including termination of employment, and may also lead to legal consequences.

## 2. SCOPE AND APPLICABILITY

This ABAC Policy applies to the Company and to all activities performed for or on behalf of the Company, either directly or indirectly. The Company encourages the adoption of this ABAC Policy by the Boards of its subsidiaries, affiliates, and joint ventures, as applicable.

This Policy extends to all individuals engaged by the Company, regardless of their position or role, including directors, senior managers, officers, employees (whether permanent, fixed-term, or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers, and any third parties acting on behalf of the Company, either directly or indirectly.

## 3. POLICY OVERVIEW

The Company maintains a strict zero-tolerance policy against bribery and corruption in all forms. We are fully committed to implementing and enforcing procedures to prevent, deter, detect, and address bribery and corruption in any capacity.

In alignment with this commitment, offering, promising, or accepting bribes, either directly or indirectly, as well as engaging in any corrupt behavior, is strictly prohibited. This policy applies to all areas of our business operations.

The Company is dedicated to keeping accurate and comprehensive financial records of all transactions, ensuring the detection and prevention of bribery and corruption.

Any breach of this ABAC Policy by personnel at Raminfo Limited will be treated as a serious violation and may result in disciplinary action. Furthermore, various jurisdictions impose strict and, in some cases, criminal liability on Raminfo Limited personnel and directors who fail to prevent bribery within their operations.

This ABAC Policy sets a baseline standard that must be followed in all countries where the Company operates. These standards apply even when local anti-bribery and anti-corruption laws are less stringent than the provisions of this ABAC Policy. However, if local laws impose stricter requirements, those laws take precedence and must be fully adhered to.

The guidelines in this ABAC Policy should be considered in conjunction with the following:

- Code of Conduct;
- Vigil Mechanism Policy;
- Any guidance issued under this ABAC Policy;
- Any other relevant policies that may be introduced over time.

#### 4. DEFINITIONS

**“Bribery”** includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value – providing 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. Bribery includes advantages provided directly, as well as indirectly through an intermediary. Bribery also includes any attempt to do any of the foregoing.

**“Corruption”** includes wrongdoing on the part of an authority, or those in power, through means that are illegitimate, immoral or incompatible with ethical standards. It is usually designed to obtain financial benefits or other personal gain. For example, bribes offered or promised in the form of money, a privilege, an object of value, an advantage to exert improper influence on decisions of an individual in his official capacity.

**“Gift, Hospitality and Entertainment”** A gift is anything of value and would encompass any gratuitous monetary or non-monetary benefit. It includes tangible items such as cash, precious metals and stones, jewellery, art and any of their equivalents, and intangible items such as discounts, services, loans, favours, special privileges, advantages, benefits and rights that are not available to the general public.

Hospitality generally includes refreshments, meals, travel and accommodation. Entertainment generally includes vacation, trips, use of recreational facilities, ticket or pass for plays/concerts/sports events. Hospitality and entertainment may also qualify as a gift unless they fall within reasonable bounds of value and occurrence.

**“Public Official** would include the following:

- i. any person holding a legislative, executive or administrative office of the government, or acting in the official capacity for or on behalf of a legislative, executive or administrative office of the government, whether appointed or elected, whether permanent or temporary, whether paid or unpaid;
- ii. 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;
- iii. 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;
- iv. 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;
- v. 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;
- vi. any elected or appointed officers or employees of public international or multilateral organizations, such as the United Nations; and
- vii. any other person who is considered as public official according to applicable laws and regulations.

**“Foreign Public Official”** broadly includes the “Public Officials” mentioned above who are not under the domestic jurisdiction (country of operation of the Company). The definition of “Foreign Public Official” is subject to the definition prevalent in local regulation applicable.

**“Facilitation payment or kickbacks”** are unofficial payments made to Public Officials in order to secure or expedite the performance/ non-performance of a routine or necessary action. They are sometimes referred to as 'speed' money or 'grease' payments or 'good-will money'. The payer of the facilitation payment usually already has a legal or other entitlement to the relevant action. “Kickbacks” are typically payments made in return for a business favour or advantage.

**“Third party”** includes any individual or organization, who/which comes into contact with the Company or transacts with the Company and also includes actual and potential clients, vendors, consultants, retainers, agents, advisors, distributors, business associates, partners (including academic institutions), contractors, suppliers or service providers who work for and on behalf of the Company.

**“Relevant Regulations”** Company upholds all laws relevant to countering bribery and corruption as applicable for the conduct of its business across all the jurisdictions in which

it operates. Different statutes adopt different yardsticks to determine whether a particular act or omission is an offence thereunder. The list and key aspects of “Relevant Regulations” are provided in **Annexure A**.

## **5. GENERAL PRINCIPLES**

### **a) Risk Assessment**

Bribery and corruption risks may vary due to various factors therefore, a risk-based approach shall be taken to build required safeguards.

A risk assessment shall be conducted to identify risk profile of the Company related to bribery and corruption. This shall include review of external factors (like industry, geographic footprint, regulatory landscape etc.) and internal factors (like policies, procedures, training program, analysis of data etc).

Based on the risk profile identified, necessary steps for its mitigation shall be taken. The risk assessment process shall be undertaken once every three years or earlier in case of a major change in factors impacting the risk e.g. nature of business, new regulation, etc.

### **b) Gifts, Entertainment and Hospitality**

Gifts, entertainment, and hospitality may be acceptable if they are reasonable, offered in good faith, and comply with the Company’s internal policies, including the Raminfo Limited Gifts Policy and any related directives issued by the Company.

No employee of Raminfo Limited shall accept or solicit personal benefits related to the Company’s business or employment if such benefits could compromise or create the appearance of compromising their impartiality or objectivity in carrying out their professional responsibilities.

Employees of Raminfo Limited are strictly prohibited from offering gifts or extending favors outside the ordinary course of business to current or potential clients, their employees or agents, or any individual (including, but not limited to, public officials) with whom the Company or its business partners have an existing contract or are in the process of negotiating one.

### **c) Facilitation Payments or Kickbacks**

Facilitation payments and kickbacks are strictly prohibited and considered unethical. Any such payments made during the Company’s business operations are explicitly forbidden.

### **d) Interaction with Customers**

Employees managing customer relationships may engage in customer entertainment only for legitimate, genuine purposes, and in accordance with the Company’s Policy. All records related to such entertainment must be maintained. Entertainment that

could be perceived as excessive, inappropriate, or intended to gain an unfair advantage is strictly prohibited.

The Company may offer discounts and rebates to customers in both the private and public sectors as part of normal business practices. However, the complexity and variety of these arrangements may pose a risk of concealing improper inducements to customer representatives. Therefore, careful attention must be given when managing and implementing such arrangements.

#### **e) Use of Third-Party Agents, Consultants, and Other Intermediaries**

The Company may be held liable for bribery conducted by third parties on its behalf, with severe consequences, even if the Company did not approve such payments. Thus, it is crucial to exercise thorough due diligence when selecting third parties.

All transactions with third parties must be conducted with the highest standards of integrity and in full compliance with applicable laws and regulations. Employees must follow the Company's internal procedures and control systems. The selection of third parties must never be influenced by the expectation of receiving or offering any gift, hospitality, payment, or favor.

Before engaging a third party, the following considerations should be taken into account:

- i. Conduct thorough due diligence and document the process.
- ii. Include anti-bribery and anti-corruption provisions, along with the Company's Code of Conduct and relevant policies, in contracts, including the right to audit and a termination clause in case of non-compliance with anti-bribery standards.
- iii. Obtain a formal, written commitment from the third party to comply with these standards.
- iv. The due diligence process should reflect the level of risk the Company faces when contracting with third parties. For example, third parties dealing with government officials on behalf of the Company are typically considered "high risk".

For high-risk third parties, comprehensive due diligence should be conducted on the key stakeholders and the entity involved. This process will include detailed checks in compliance databases, media records, site visits, market research, and financial evaluations. Due diligence will occur during onboarding and at regular intervals (at least every two years) or whenever contracts or purchase orders are renewed.

For low-risk vendors, the due diligence process may be limited to searches in relevant compliance databases and media records. This should be done at least once every three years or upon contract renewal.



## **f) Government Interaction**

Doing business with the government is highly regulated and typically follows stricter rules than those in the commercial marketplace. If you work with government officials or a government-owned (or partially owned) company, you have a special duty to know and comply with applicable laws and regulations, adhere to the highest standards of integrity and avoid even the appearance of impropriety. Our Company may interact with the government, government officials and government agencies in multiple forms, such as: for seeking statutory or regulatory approvals, as a supplier, as a customer etc. Raminfo Limited Personnel should always be truthful, accurate, co-operative and courteous while representing our Company before any government, government officials and government agencies.

## **g) Political, Community, or Charitable Contributions and Sponsorships**

- i. We shall act in accordance with the constitution and governance systems of the countries in which we operate. We do not seek to influence the outcome of public elections, nor to undermine or alter any system of government. We do not support any specific political party or candidate for political office. Our conduct must preclude any activity that could be interpreted as mutual dependence / favour with any political body or person and we do not offer or give any company funds or property or other resources as donations to any specific political party, candidate or campaign.
- ii. Any financial contributions considered by our Board of Directors in order to strengthen the democratic system of governance through a clean electoral process shall be extended only through the Progressive Electoral Trust in India or by a similar transparent, duly authorised, non-discriminatory and non-discretionary vehicle outside India.
- iii. Raminfo Limited Personnel are not allowed to make political contributions from the funds, properties or other resources of our Company except political contributions approved by the Board in accordance with the compliance and applicable laws.
- iv. Our Company may make charitable donations for humanitarian needs and other factors, including emergency situations and disaster relief. Such contributions must be made in compliance with our Company's Corporate Social Responsibility Policy ("CSR Policy"). However, it is important that we exercise reasonable caution when making donations, such that the donations made shall be without any demand or expectation, so as to ensure that our donations would not be considered inducements in any form or manner. Thus, contributions by the Company to community projects or charities need to be made in good faith and in compliance with this ABAC Policy and all other relevant policies and procedures, as updated from time to time.
- v. Before making such a contribution, the Raminfo Limited Personnel should ensure that:

- Such charitable contributions are not dependent on, nor made to secure, a business deal.
  - The contribution is always made to the charity and not to any particular individual, except where donations or grants are provided directly to affected victims of natural disasters, pursuant to our Company's CSR policy.
  - Contributions should be given to entities where the end use of the contribution is known and/or controlled.
  - Contributions should only be made to charitable organisations which are registered under the applicable laws of the country.
  - As far as possible, background checks on the charitable organisations should be carried out in all cases, especially to ensure that the charity does not act as a conduit to fund illegal activities in violation of anti-money laundering laws, anti-terrorism laws and other applicable laws.
  - Only such charitable contributions shall be made that are legal and ethical under the local laws and practices.
- vi. Sponsorships are closely allied to the various types of community / business activities undertaken by our Company. These could range from sponsoring educational scholarships to local sports teams. Any sponsorship must be for genuine business or charitable objectives without any element of quid pro quo. Any such sponsorship must be transparent, duly approved, properly documented and duly reported as per our Company's CSR or any other applicable policy.

#### **h) Mergers and Acquisitions, Joint Ventures, Partnerships**

Our Company will undertake appropriate and reasonable due diligence regarding compliance with anti-bribery and anti-corruption procedures and on the reputation and integrity of any business in which it makes investments.

Our Company, when it is acquiring a potential target or entering into a joint venture or partnership or similar business arrangement, will extend the relevant policies to such business units, train employees of such business units, re-evaluate third parties under company standards and where appropriate, conduct audits on such business units.

#### **i) Books, Records and Internal Control Requirements**

Accurate and complete recordkeeping is essential to the successful operation of our Company, as well as to our ability to meet our legal and regulatory obligations. Each Raminfo Limited Personnel has a responsibility to be accurate, complete and honest in what they report and record in all internal and external documents of our Company, including but not limited to the accounting records, timecards, expense reports, invoices, payroll records, safety records, business records, performance evaluations, contracts etc.

All business units and entities must maintain an effective system of internal control and monitoring of our transactions. Certain monitoring controls are identified in our policies, specifically regarding approval of travel and entertainment expenses.



Our records management and retention policies ensure to maintain the records required to meet legal, tax and regulatory requirements and securely dispose off records that are no longer needed or are beyond the statutory retention period.

## **6. RESPONSIBILITIES**

### **a) Audit Committee / Board of Directors**

The Audit Committee/Board of Directors of the Company (“Board”) shall have oversight of governance and compliance with this ABAC Policy. Aggravated cases of breach of this ABAC Policy shall be escalated immediately to the Audit Committee or Board.

The Audit Committee will monitor the effectiveness and review the implementation of this ABAC Policy, considering its suitability, adequacy and effectiveness.

### **b) Compliance Officer**

The Company shall, designate the Company Secretary of the Company as the Compliance Officer to ensure compliance with the provisions of this ABAC Policy and the same shall be notified to the Raminfo Limited.

Compliance Officer should ensure that regular and relevant on-going training and awareness sessions are made available to Raminfo Limited Personnel in relation to this ABAC Policy.

All reports, complaints, doubts or concerns in relation to this ABAC Policy shall be raised to the Compliance Officer. Any query, concerns or complaint received by any Raminfo Limited Personnel including Company Chief Executives regarding bribery or corruption issue should be promptly reported to the Compliance Officer.

Every query or concern raised in relation to any suspected violation of this ABAC Policy shall be reviewed/investigated by the Compliance Officer. Any action required to be undertaken shall be taken by the Compliance Officer in accordance with this ABAC Policy.

### **c) Raminfo Limited Personnel**

Raminfo Limited Personnel should familiarise themselves with this ABAC Policy and other policies, procedures and controls like Gifts and Hospitality through participation in training sessions made available or guidelines issued by the Company from time to time.

Raminfo Limited Personnel must comply with this ABAC Policy and ensure that our Company’s procedures and measures to mitigate ABAC risks are upheld and strengthened. If in doubt whether an act would breach this ABAC Policy, take a step back and ask oneself the following for the contemplated action:

- What is the intent – will this act be perceived as taking or giving undue advantage?

- How would it look if these details were on the front page of a major newspaper or social media?

Whenever faced with a doubt on this ABAC Policy or about any act that can be perceived to be a potential breach of this ABAC Policy, the Raminfo Limited Personnel shall consult Compliance Officer.

Raminfo Limited Personnel are required to ensure that all expense claims relating to hospitality, gifts, charitable donations or payments made to third parties are submitted in accordance with applicable policies and that all such expense claims specifically record or state the reason for such expenditure.

Raminfo Limited Personnel who are in managerial positions shall ensure that their team members are familiar with this ABAC Policy and other related policies herein. They shall guide and ensure that the guidelines in this ABAC Policy are upheld and adhered to by their team members and the third parties working with them.

It will be the duty of each Raminfo Limited Personnel to report any non-compliance or any Red Flag indicators (Refer **Annexure B**) noted so that necessary action can be taken by the Company promptly to mitigate the risks and other consequences arising therefrom.

Raminfo Limited Personnel shall provide full cooperation for any enquiry or investigation conducted or to be conducted by the Company for potential violation of this ABAC Policy.

## **7. COMMUNICATION AND TRAINING**

Regular training and awareness sessions shall be made available in relation to this ABAC Policy, obligations of Raminfo Limited Personnel, company procedures and measures. The details of Company's vigil mechanism procedures will be disseminated throughout the Company on a regular basis.

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

## **8. WHEN COMPELLED FOR BRIBE OR FACILITATION PAYMENT**

While the Company remains committed to its policy of prohibiting any bribe or facilitation payment, it recognises that there may be certain exceptional circumstances in which Raminfo Limited Personnel's or third party's health and safety is compromised due to demand of bribe or facilitation payment by an individual with authority. For example, the exceptional circumstance could be demand of facilitation payment by Public Official for urgent medical evacuation of an injured Raminfo Limited Personnel.

For such exceptional circumstances, Raminfo Limited Personnel must consult either their Reporting Manager or Compliance Officer before conceding to the demand of bribe or facilitation payment. Any payment made under such exceptional circumstances must be reported formally to the Compliance Officer within 24 hours with complete details regarding the same.

The Compliance Officer shall report the matter to the relevant law enforcement authority or regulatory body within a period of seven days from the date of such payment.

## 9. REPORTING OF CONCERNS AND INVESTIGATIONS

Every Raminfo Limited Personnel is encouraged to raise concerns about any bribery issue or any case of corrupt practice or any breach of this ABAC Policy or applicable ABAC law at the earliest. If they are unsure whether a particular act constitutes bribery or corruption or if they have any other queries, these should be raised with their respective reporting manager and the Compliance Officer at the following email address: [cs@raminfo.com](mailto:cs@raminfo.com).

Raminfo Limited Personnel may also raise concerns or queries to the Compliance Officer through 'Raising Concerns' mechanism under the 'Vigil Mechanism Policy'.

No personnel who in good faith, reports a violation of this ABAC Policy shall suffer any harassment, retaliation or adverse employment consequences.

For the reported concern(s) of potential or actual violation(s) of this ABAC policy, the Compliance Officer shall take appropriate steps such as:

### a. Investigation:

- i. Enquiry or investigation of the reported concern for potential violation of this ABAC Policy shall be conducted by or with oversight of the Compliance Officer. The objective of such enquiry or investigation would be to determine the facts.
- ii. All investigations shall follow principles of natural justice and shall ensure that the relevant Raminfo Limited Personnel are provided with an opportunity to make their case before the investigation team.
- iii. Experts with the right knowledge and skills may be appointed to investigate the reported concern.
- iv. The investigation process and the report should be kept confidential and shall be shared only with such persons who have a "need to know" under applicable law or Company's standard investigation process.

b. **Corrective Action:** If necessary, corrective actions shall be prescribed or suggested to appropriate managers, officers and employees for implementation.

c. **Disciplinary Action:** The Compliance Officer after considering inputs from relevant stakeholders shall recommend appropriate disciplinary action, including but not limited to suspension and termination of service of such a defaulting Raminfo Limited Personnel. The Compliance Officer shall also recommend if the violation is potentially criminal in nature and should be notified to the relevant authorities under applicable law. In the event of criminal or regulatory proceedings, the Raminfo Limited Personnel shall co-operate with relevant authorities. Depending on the nature

and scale of default the Compliance Officer may also recommend to the Board to commence civil and/or criminal proceedings against such Raminfo Limited Personnel in order to enforce remedies available to the Company under applicable laws.

## **10. PENALTIES**

Any violation of this ABAC Policy by a Raminfo Limited Personnel will be regarded as a serious matter and shall result in disciplinary action, including but not limited to termination of employment, consistent with applicable law and the employee's terms of employment.

Bribery is a criminal offense. Raminfo Limited Personnel will be accountable whether they pay a bribe themselves or if such Raminfo Limited Person authorizes, assists or conspires with someone else in contravention to the antibribery and anti-corruption laws. Punishments for violating the law against an individual includes imprisonment, probation and monetary fines (which will not be paid by the Company). For example, punishment under the PC Act ranges between 3 years and 7 years, along with a fine (There is no limit on the maximum fine payable).

## **11. AMENDMENT OF ABAC POLICY**

Our Company reserves the right to vary and/or amend the terms of this ABAC Policy from time to time.

Last reviewed and amended on – 19.05.2025

## ANNEXURE A - RELEVANT REGULATIONS

### **Prevention of Corruption Act, 1988 (PC Act), India**

The Prevention of Corruption Act, 1988 (PC Act) was enacted to prevent corruption in government departments and to prosecute and punish public servants involved in corrupt practices. An amendment was enacted (Amendment Act) and brought into force on 26 July 2018.

The Amendment Act provides that any public servant who obtains or accepts or attempts to obtain from any person, any 'undue advantage', either for himself or for any other person, with the intent to perform or cause performance of public duty improperly or dishonestly or to forbear or cause forbearance to perform such duty, shall be punishable with imprisonment for a minimum term of 3 (three) years and maximum of 7 (seven) years and shall also be liable to fine. The Amendment Act has defined 'undue advantage' to mean any gratification (not limited to pecuniary gratifications or to gratifications estimable in money), other than legal remuneration.

As per the Amendment Act, giving an undue advantage by a person to a public servant is considered an offence punishable with imprisonment upto 7 (seven) years or fine or both. However, if a person is forced / coerced to give an undue advantage but reports the same to the concerned authority within 7 (seven) days of doing so, he shall not be liable for the same.

The Amendment Act prescribes the offence relating to bribing a public servant by a commercial organisation, wherein a commercial organisation has been defined to include not just a body or partnership incorporated and carrying on business in India, but also a body or partnership incorporated or formed outside India but carrying on business in India. The Amendment Act has a specific provision for offences committed by commercial organisations and persons associated with it. It provides that if a commercial organisation commits any of the offences listed out in the PC Act, then every director, manager, secretary or other officer with whose 'consent or connivance' the offence was committed, is to be made liable as specified under the PC Act.

## **ANNEXURE B - RED FLAG INDICATORS**

While an exhaustive list cannot be provided, set out below are indicative questionable transactions or situations that Raminfo Limited Personnel should be careful about – which, when appearing together or individually, should raise a ‘Red Flag’ to the Reporting Manager or the Compliance Officer:

- i. A contract requires the use of a third-party consultant where the third party’s principal or owner is a government official;
- ii. The business lacks qualifications or resources i.e. the potential business partner does not appear capable of performing the services being offered. Sham service contracts, under which corrupt payments are disguised using a consulting agreement or other arrangement are typical modalities for indulging in bribery or corrupt activities;
- iii. Any potential partner who provides guarantees of success or claims to have the ability to obtain licenses or other government approval without providing a description of a legitimate manner by which those goals will be accomplished;
- iv. Transactions involving unusual payment patterns or financial arrangements. Accordingly, a request to pay unusually high commissions is a warning sign of possible corruption. A request to deposit commissions in multiple bank accounts, perhaps in offshore banks, also justifies additional scrutiny;
- v. A potential third party who refuses to accept an ABAC or anti money laundering clause in the proposed contract;
- vi. Based on pre-acquisition due diligence, it becomes apparent that the potential counterparty has a reputation for offering bribes or violating other laws or indulging in unusually structured transactions;
- vii. Inflated payouts to, or questionable role in the project of potential counterparty or its affiliate;
- viii. A proposed third-party resist or fails to provide details of parentage or has undisclosed principals, associates or subcontractors with whom it splits fees;
- ix. A third-party counterparty refuses access to its books and records where requested under the proposed contract.
- x. A Public Official suggests, requests, urges, insists or demands that a particular third party, company or individual be selected or engaged, particularly if the official has discretionary authority over the business at issue.
- xi. The third party insists on dealing with government officials without the participation of the Company.
- xii. The fee, commission or volume discount provided to the third party is unusually high compared to the market rate.
- xiii. Third party has a reputation for paying bribes or requiring that bribes be paid to them or has a reputation for having a "special relationship" with government officials.



## ANNEXURE C - DECLARATION BY EMPLOYEE

I, the undersigned do hereby certify that,

- I have read and understood this ABAC Policy of the Company.
- I also affirm to comply with the requirements of this ABAC Policy, during my employment with the Company.
- I will not engage in, nor attempt to engage in any acts of bribery or corruption, as understood in this ABAC Policy, while discharging my duties for or on behalf of the Company or in any personal capacity during the term of my employment with the Company.
- In case I come across any instances of non-compliance with this ABAC policy, I shall promptly highlight such non-compliance to the relevant authorities in the Company.

Employee Name \_\_\_\_\_

Employee code \_\_\_\_\_

Designation \_\_\_\_\_

Department \_\_\_\_\_

Date \_\_\_\_\_

Signature \_\_\_\_\_