

## Anjanajyoti Systems Private Limited

### Anti-Bribery Policy

Effective Date: 01.01.2020

#### Introduction

Anjanajyoti Systems Pvt. Ltd. (hereinafter referred to as "the Company") is committed to conducting its business operations with the highest standards of integrity and ethics. This Anti-Bribery Policy is designed to ensure compliance with the laws and regulations related to anti-bribery and corruption in India, including but not limited to the Prevention of Corruption Act, 1988, and the Foreign Corrupt Practices Act (FCPA).

#### Scope.

This policy applies to all directors, officers, employees, contractors, agents, and any other parties associated with Anjanajyoti Systems Pvt. Ltd (collectively referred to as "Employees").

#### Prohibition of Bribery

The Company strictly prohibits any form of bribery or corruption, including the offering, giving, receiving, or soliciting of bribes, kickbacks, facilitation payments, or any improper advantage, whether directly or indirectly, to gain or retain business or any other improper advantage.

#### Compliance with Laws

Employees must comply with all applicable anti-bribery and corruption laws, regulations, and standards in India. This includes but is not limited to the Prevention of Corruption Act, 1988, and any other relevant legislation.

#### Gifts, Hospitality, and Entertainment.

The provision or acceptance of gifts, hospitality, or entertainment should be reasonable, proportionate, and consistent with customary business practices. It must not create any perception of impropriety or influence decision-making in favour of the Company, its Clients or its employees. All

gifts, hospitality, or entertainment exceeding a nominal value must be recorded and disclosed in accordance with the Company's policies and procedures.

#### Facilitation Payments

Facilitation payments, also known as "grease payments," are small sums paid to expedite or secure the performance of routine government actions or services. These payments are strictly prohibited by the Company, and no Employee should make or accept such payments.

#### Business Partners and Third Parties

Employees must exercise due diligence and take reasonable steps to ensure that the Company's business partners, such as clients, suppliers, agents, consultants, and other intermediaries, do not engage in bribery or corruption on behalf of the Company.

#### Reporting and Whistleblower Protection

Employees are encouraged to report any known or suspected instances of bribery or corruption promptly. The Company will protect whistleblowers from retaliation and treat all reports confidentially. Reports can be made to [legal@anjanajyoti.org](mailto:legal@anjanajyoti.org).

#### Disciplinary Action

Any Employee found to be in violation of this Anti-Bribery Policy shall face disciplinary action, including but not limited to termination of employment or contractual relationship. The said actions shall also be promptly reported to the concerned law enforcement agencies for adequate legal proceedings.

#### Training and Communication

The Company will provide anti-bribery training to all relevant Employees, emphasizing the importance of compliance with this policy and relevant laws. This policy will be communicated to all Employees and made readily accessible through the company website.

### Compliance Monitoring and Review

The Company will periodically review and update this Anti-Bribery Policy to ensure its continued effectiveness and compliance with applicable laws. Compliance with this policy will be monitored, and appropriate actions will be taken to address any breaches.

### Conclusion

This Anti-Bribery Policy is a reflection of the Company's commitment to conducting business ethically and maintaining the highest standards of integrity. Compliance with this policy is essential for all Employees to protect the Company's reputation and to contribute to a fair and transparent business environment in India.

**Ujjwal Handa**

Director

Anjanajyoti Systems Pvt. Ltd