


 <b>SAKSOFT LIMITED</b>	<b>Anti-Bribery and Anti-Corruption Policy</b> <b>Department:</b> Human Resources	<b>Doc. No:</b> ESG/MWP/01 <b>Issue 02; Rev. No :</b> 00
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# Anti-Bribery and Anti-Corruption Policy

## 1. Purpose

Saksoft is committed to the highest standards of ethical conduct and business integrity. This policy enforces Saksoft's zero-tolerance approach to bribery and corruption in all its operations and interactions. It is designed to maintain transparency and integrity in all business dealings, ensuring that Saksoft employees and representatives conduct business honestly, legally, and fairly.

## 2. Scope

This policy applies to all Saksoft employees, directors, officers, contractors, consultants, vendors, and any third parties acting on behalf of Saksoft, across all regions and locations. It covers all activities and transactions involving government officials, clients, suppliers, and other stakeholders.

## 3. References

- Prevention of Corruption Act, 1988 (India)
- UK Bribery Act, 2010
- Saksoft Code of Conduct
- Saksoft Whistleblower Policy

## 4. Definitions


**Bribery:** Offering, giving, receiving, or soliciting something of value to secure an advantage to which one is not entitled. It involves the improper performance of a personal, company, or official responsibility.

**Business Integrity:** Conducting business with honesty, opposing all forms of corruption that could damage Saksoft's reputation for fair dealing.

**Corruption:** The misuse of power for private gain, which includes acts like bribery, graft, and facilitation payments

**Facilitation Payments:** Small payments made to expedite routine actions by government officials, such as customs clearances or utility connections, which are strictly prohibited

**Gifts and Hospitality:** Includes any form of gift, reward, benefit, or hospitality extended to build business relationships. This must be nominal in value and must never be used to gain business advantages.

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**Kickbacks:** Payments made by third parties to individuals as a reward for securing contracts or business advantages.

## 5. Roles and Responsibilities

Role	Responsibility
Board of Directors	Provide oversight on anti-bribery and anti-corruption policies, ensuring ethical business practices are upheld.
Legal and Compliance Team	Monitor legal developments, update the policy, and ensure Saksoft's compliance across all regions.
Managers	Approve or decline gifts and hospitality after evaluating appropriateness, and report any questionable activities.
Employees and Third Parties	Strictly adhere to the policy, avoid unethical practices, and report any suspected violations via Saksoft's whistleblower channels.

## 6. Policy Provisions

**Zero Tolerance for Bribery and Corruption:** Saksoft prohibits any form of bribery or corruption. Employees and associates must not offer, solicit, or accept bribes, kickbacks, or facilitation payments.

**Gifts, Entertainment, and Hospitality:** Gifts or hospitality may only be accepted if they are of nominal value and do not influence business decisions. Employees must seek approval from managers, who may consult the Legal and Compliance Team or the Compliance Officer at [complianceofficer@saksoft.com](mailto:complianceofficer@saksoft.com). Retrospective approval may be sought if prior approval was not possible.

**Approval Process for Gifts and Hospitality:** Approvals for gifts and hospitality must be documented in writing. Employees should avoid accepting gifts during sensitive times, such as contract negotiation periods.

**Third-Party Due Diligence:** Saksoft will conduct due diligence on third-party representatives, vendors, or consultants before engagement to ensure their compliance with anti-corruption standards.

**Political and Charitable Contributions:** Any contributions to political or charitable organizations must be approved by senior management and must comply with legal requirements, ensuring they are not made to influence business decisions.

**Reporting and Whistleblowing:** Suspected violations of this policy should be reported via Saksoft's whistleblower channels at [whistleblower@saksoft.com](mailto:whistleblower@saksoft.com) or [complianceofficer@saksoft.com](mailto:complianceofficer@saksoft.com). Reports are confidential, and retaliation against whistleblowers is strictly prohibited.

**Record Keeping:** Accurate and transparent records of financial transactions, gifts, and hospitality must be maintained. Altering or falsifying records to hide unethical practices is strictly prohibited.

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## 7. Exceptions

Exceptions to this policy are not permitted unless explicitly approved by the Legal and Compliance Team in consultation with the Board of Directors. Approval for exceptions must comply with applicable laws.

## 8. Monitoring and Compliance

**Quarterly Compliance Audits:** The Legal and Compliance Team will conduct audits every quarter to ensure adherence to the policy and identify any areas of improvement.

**Training:** All new employees will receive mandatory anti-bribery and anti-corruption training and existing employees shall receive refresher training at least once in 3 years, focusing on ethical conduct and awareness of legal obligations.

**Process Flow for Reporting:** Upon receipt of a report, the Compliance and Legal Teams will form a committee to investigate and will submit findings to the Managing Director and Head of HR. Appropriate disciplinary action will be taken based on the report outcome.

## 9. KPIs for Monitoring Policy Implementation

KPI	Description	Target	Frequency	Responsible Team
Percentage of Employees Trained	Percentage of employees who completed annual anti-bribery and anti-corruption training.	100%	Annually	HR, Compliance
Incidents of Reported Violations	Number of reported cases of bribery or corruption, with corrective actions taken.	0	Quarterly	Compliance, Legal
Approval Compliance Rate	Percentage of gifts and hospitality that received the necessary approvals as per policy guidelines.	100%	Quarterly	Compliance, Legal
Third-Party Compliance Rate	Percentage of vendors and suppliers agreeing to and complying with Saksoft's anti-bribery policy.	95%	Annually	Procurement, Compliance

## 10. Distribution list

All Saksoft employees, Third party vendor resources