



# Anti-Corruption and Anti-Bribery Policy: Apis India Limited

## **Preamble**

Apis India Limited (hereinafter referred to as "Apis India" or 'The Company'), has a quest for competitive excellence, entailing its commitment to an inclusive approach, lawful and ethical conduct, and adherence to our core values- viz., transparency, integrity, honesty, and respect for people. The policy emphasizes Apis India zero-tolerance approach to bribery and corruption. The policy establishes the principles with respect to anti-bribery and anti-corruption laws. The policy provides information and guidance about how to recognize, deal with, and report bribery and corruption.

## **Purpose of the Policy**

The purpose of this Anti-Bribery and Anti-Corruption Policy ("The Policy") is to ensure that employees and workers of Apis India ethically conduct business and understand & adhere to the requirements of all applicable anti-bribery laws and best practices. This policy provides information and guidance to those working for and with Apis India on how to recognize and deal with issues concerning bribery and corruption. To deal with global third parties, Apis India shall comply with all applicable local laws and regulations that aim to prevent bribery and corruption.

## **Scope of Policy**

The principles and obligations outlined in this policy apply to Apis India, its employees, and third parties (if acting on behalf of Apis India Limited). Subject to applicable laws, Apis India shall ensure that all of its subsidiaries and affiliates adopt and implement a similar policy. The policy may apply to the partnerships and joint ventures that the company mutually accepted. Best efforts will be ensured to have this agreed upon by the partnerships and joint ventures. As such everyone is responsible for adhering to these standards in all business interactions.

## **Definitions**

**"Gifts, Hospitality, and Donations/Favors"** means anything of value, including, but not limited to, money, stored-value cards, gratuities, commissions, rebates, loans, loan guarantees, payment of debts, transportation, use of property, charitable donations, medical treatments, medication, entertainment, hospitality, travel, internships (paid or unpaid), employment opportunities, admission opportunities, goods, or services.

**"Policy"** means "Anti-Corruption and Anti-Bribery Policy"

**"Charitable Donation"** is financial or other support provided to

- a) an organization recognized as a charitable organization under local laws;
- b) an organization or informal group primarily organized to provide a community or public benefit
- c) an organization or informal group that is organizing an event to provide a community or public benefit.

**"Employee"** For the purposes of this policy this includes all individuals working at all levels and grades (whether permanent "full-time", "part-time", fixed-term, or temporary), including but not limited to trainees, permanent or non-permanent workers, and agency staff, volunteers, interns, duly authorized agents or any other person working under the supervision and associated with **"Apis India Limited"**.

**"Entertainment"** refers to any form of entertainment, including but not limited to tours and cultural, social, and sports events.

**"Director"** is an Employee of **"Apis India Limited"** with the rank "Director".

**"Government Official"** is broadly construed to include:

- any elected or appointed person that performs a (national or international) government function;
- any employee or other person acting for or on behalf of a government official, agency, instrumentality, or enterprise that performs a government function;
- any political party, officer, employee, or other person acting for or on behalf of a political party, or
- any candidate for public office;
- any employee or person acting for or on behalf of a public [international organization; or
- any employee or other person acting for or on behalf of any entity that is wholly or partially government-owned or controlled as well as any public service employee or international organization employee.

**"Third Party"** includes but is not limited to any natural persons and individuals that represent Third Parties, as well as juristic persons (companies/organizations) such as vendors, consultants, agents acting on behalf of Apis India Limited, sales/implementation partners, contractors, subcontractors that either have a direct/indirect relationship with Apis India Ltd. business contacts, customers, government entities, and government officials.

### **Policy Statement**

The company is committed to complying with all laws and regulations which govern all operations in every office/plant location. This Anti-Corruption and Anti-Bribery Policy ("The Policy") explains our responsibility to comply with anti-bribery and anti-corruption laws (as applicable). The company has a zero-tolerance attitude toward corruption and bribery. The company is, therefore, committed to doing business ethically and expects its employees to follow and practice ethical business practices.

Any violation of this policy may result in disciplinary action, up to and including dismissal in appropriate circumstances. It is, therefore, extremely important that employees familiarize themselves with this policy and strictly adhere to it.

### **Gifts, Hospitality, and Donations**

In developing or retaining commercial relationships, the act of giving or getting corporate hospitality can play a suitable role. Gifts and hospitality, however, are difficult. Particularly if they generate real or perceived conflicts of interest or otherwise seem to affect a choice or influence a decision. The employees are forbidden to accept donations, discounts, favours, or services from an existing or potential client, competitor, supplier, or service provider. Extra care must be taken in functions such as procurement and sales.

The employees shall never directly or indirectly offer to pay or authorize an offer to pay money or anything of value to a government official or any other person or entity, which is intended to influence the judgment of the recipient, intended to secure preferential treatment or improper advantage for the company or intended as a gratification for taking a decision/action favoring the Company.

**Financial and non-financial advantages include, but are not limited to:**

- cash
- cash equivalents, such as gift cards, vouchers, loans
- Gifts, entertainment, or hospitality
- Charitable Donations
- Educational, employment, or other valuable opportunities

**Working with the Government/Regulator**

When dealing with government or regulatory (industry/tax/municipal, etc.) officials, the company must adhere to the highest standards of business conduct. All payments to government entities must be for the legitimate delivery of our goods and services. Many government entities have harsh penalties for companies that improperly bill the government. Payments that are made to gain or retain an improper business advantage are prohibited. Where necessary, employees and third parties should be prepared to submit documentation about the goods and services that were provided with information such as the type of products, quantity, date of delivery, name of the contact at the government entity, and similar information. The company must not offer, provide, or solicit anything of economic value in return for any special treatment or favour and do not employ a relative of any government official in return for any favours.

If government officials are using their power to demand an illegal payment, employees and third parties do not yield to this demand but contact a supervisor who should be at least a director.

**Charitable Contributions**

The company makes charitable contributions that are legal and ethical under local/ national law and practices. Charitable contributions can only be given to needy people/organizations. All donations must be transparent and properly recorded in the company's books and records; documented with a receipt or have a letter of acknowledgement from the charity to ensure that the donations receive the proper tax treatment; and be compliant with local law, regulations, or local or business unit internal policies.

**Facilitation Payments & Kickbacks**

The company prohibits employees making or accepting, facilitation payments or "kickbacks" of any kind. Typically, facilitation payments are tiny, informal payments made by an official to secure or speed up a routine action. Typically, kickbacks are payments made in exchange for a benefit. All persons covered by this policy must prevent any activity that may result in the payment or kickback of facilitation.

**Transactions with Third Parties**

In coordination with Corporate Compliance, all relevant departments of Apis India Limited are responsible for establishing adequate registration/selection, due diligence, and engagement processes as outlined in the Company's Code of Conduct. Third Parties working with/for Apis India Limited need to sign an agreement that includes provision stating that they do not and will not engage in bribery and corruption.

Employees must be careful when agreeing on prices and payment terms with third parties as some types of compensation arrangements can be used or viewed as bribes. Prices must be commercially reasonable and commensurate with the deliverables. The deliverables that are provided for the agreed price must be clearly defined and documented and the payments of the price must be clear and accurate. Any performance-based reimbursement conditions shall be agreed upon on a contractual basis

### **Questions about this Policy**

- No policy can anticipate every possible situation that might arise. Employees and Third Parties are encouraged to discuss with Corporate Compliance, any questions about specific facts and circumstances that may implicate provisions of this policy.
- Any questions regarding this policy shall be raised with a supervisor who should be at least a Director.
- If confronted with a situation in which there is any doubt or uncertainty about the legality of a payment, expenditure, or other action, he/she should contact a supervisor who should be at least a Director and/or Corporate Compliance for advice before proceeding.

### **Responsibility of Individuals**

Every individual covered by this policy must guarantee that they have read and understood this policy and must comply with this policy's terms and conditions at all times. It is the duty of all those who work for the company or are under our control to prevent, detect, and report corruption. All individuals should avoid and prevent any activity that could result in any violation of this policy, or propose it. Individuals must notify their reporting manager or consult with any suitable member of the Human Resources (HR) team as quickly as possible if they think or suspect or have reason to think or suspect that a violation of this policy has happened or may happen in the future. Any person who breaches any of the terms of this policy will face disciplinary action that may result in being dismissed.

### **Reporting Potential Misconduct/Non-Conformance and Protection**

All employees/ workers are encouraged to raise issues or suspicion of any concerns of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, they should raise the matter with their reporting manager or consult an appropriate member of the Human Resources (HR) team. HR, the responsible people for the whistle-blower line, or any supervisor receiving reports of suspected violations of this Policy must report all details to Corporate Compliance via email [hr@apisindia.com](mailto:hr@apisindia.com).

The company encourages openness and any issue/concern raised in good faith would be supported by the company under this policy, even if the issue/ concern turns out to be mistaken. The company would ensure that any employee/ worker would not suffer detrimental treatment as a result of refusing to take part in bribery/ corruption, or because of reporting about an issue or concern.

Detrimental treatment would include disciplinary action, dismissal, or unfavorable treatment. Any employee/ worker who believes that they have faced such treatment should report the same to the Human Resource Head.

### **Training & Communication**

Dissemination of this policy for new employees shall be carried out at the time of induction. This policy will also be shared with all current employees. If any employee has any query about this policy, he/she should contact their reporting departmental head.

### **Responsibility and Implementation**

It is the company's Human Resources Department's responsibility to ensure that this policy is complied with by all the employees. At the office and site levels, the respective heads are responsible for implementing this policy.

### **Monitoring & Review**

All respective responsible persons will monitor the efficiency and review this policy's execution, considering its suitability, adequacy, and efficiency regularly. Any recognized improvements will be produced and integrated as quickly as possible. Internal control systems and procedures will be subject to regular audits to ensure that they are effective in countering bribery and corruption. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing. Individuals are invited to comment on this policy and suggest ways in which it might be improved.