

**Applicability:** All Employees of DGSL, DRSL in India & Overseas.

**Document Owner:** Dr Rima Ghose Chowdhury

<b>Contribution</b>	<b>Name</b>	<b>Project/Organization Role</b>
Prepared By	Sarika Kalghatgi	Manager- HR
Reviewed By	Prashant Gautam	AVP – Corporate HR
Recommended By	Dr Rima Ghose Chowdhury	Executive Vice President, CHRO & CSR Leader
Approved By	Rahul Kanodia	Vice Chairman & CEO

**Version Control v.1.4**  
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**Summary:** Datamatics has a zero-tolerance approach to bribery, corruption, and money laundering and is committed to acting professionally, fairly, and with integrity in all its business activities and relationships. The Company is dedicated to operating and enforcing systems and policies that detect and deter bribery, corruption, and money laundering. This policy outlines acceptable and non-acceptable behaviours to ensure compliance with anti-corruption and anti-money laundering laws.

<b>HR Policy No: 3</b>	<b>Version: <u>v.1.4</u></b>
<b>Key area : Integrity and Business Practices</b>	<b>Policy Title: Anti-Bribery, Anti-Corruption and Anti-Money Laundering Policy</b>
<b>Date of implementation: 1st April, 2024</b>	<b>Next Review Date: 31st March, 2025</b>

### 1.0 Objective:

The policy outlines acceptable and non-acceptable behaviors to ensure compliance with anti-bribery, anti-corruption and anti-money laundering laws. It includes prohibiting improper payments, kickbacks, offers, or inducements of any kind including gifts and hospitality to and from any person, including officials in the private or public sector, customers, and suppliers in conducting domestic or international business.

### 2.0 Scope & Coverage:

This policy shall apply to all Employees, Agents, Sponsors, Vendors, Consultants or any other people or bodies associated with DGSL & DRSL in India and overseas.

### 3.0 Definitions:

- 3.1 **Bribe:** Anything of value tangible or intangible given in an attempt to affect a person's actions or decisions in order or to gain or retain a business advantage. Anything of value includes cash, entertainment or other gifts or courtesies.
- 3.2 **Corruption:** The misuse of a public office or power for private gain or the misuse of private power in relation to business outside the realm of government.
- 3.3 **Kickbacks:** The return of a sum already paid or due as a reward for awarding of furthering business.
- 3.4 **Facilitation Payments:** Small sums paid to government officials to facilitate or expedite routing. Non-discretionary government actions are considered facilitation payment.
- 3.5 **Money Laundering:** The process of concealing the origins of illegally obtained money by passing it through a complex sequence of banking transfers or commercial transactions to make the funds appear legitimate.

### 4.0 Guidelines:

- 4.1 Employee must conduct company business in compliance with the highest professional and ethical standards, Professional and ethical standards, with honesty and integrity, and within the laws of all countries in which company with the spirit, as well as the letter, of the Policy, laws, and regulations.

- 4.2 Employee does not engage in bribery or any form of unethical inducement or payment and the use of company funds, other funds, or other forms of incentive, regardless of size or amount, to elicit the offering, promising, or giving of financial or other advantage to another person, to induce such a person to perform improperly or reward improper performance or any other unlawful, improper or unethical purpose is strictly prohibited.
- 4.3 Prohibited payments or incentives under (2<sup>nd</sup> point of Guidelines) include any offer, gift or payment , or any authorization of an offer, gift or payment, or any money or thing of value to or for the benefit of any government or corporate official, director or employee, or any other person.
- 4.4 In the course of business employee must not request, agree to receive, or accept a financial or other advantage with the intension of, or as a consequence of, performing a relevant function improperly. Such advantage may include any offer, gift or payment or any money or things of value.
- 4.5 Facilitation payments are not allowed.
- 4.6 Political Community and Charitable Contributions- Employees are not allowed to make political contributions from Company Funds- without authorization, Contributions made by the company to community projects or charities need to be made in good faith and in compliance with this Anti-Bribery and Anti-Corruption Policy and all relevant Company policies and procedures.
- 4.7 Employees must be vigilant and report any suspicious activity or transactions that may indicate money laundering. This includes any attempts to disguise the origins of illegally obtained funds or to integrate such funds into the legal economy.
- 4.8 The Company is committed to preventing money laundering and complies with all applicable anti-money laundering laws and regulations. Any involvement in money laundering activities is strictly prohibited and will be subject to disciplinary action.

## **5.0 Training and Communication:**

The Company will communicate this policy and any relevant guidance to all the employees across the Group through established internal communication channels. This policy will be brought to the attention of new employees as part of their induction process.

## **6.0 Penalties:**

The Company will take firm disciplinary action in cases of fraud, bribery, corrupt practices and money laundering which may lead to dismissal or the termination of contract of involved parties.

**7.0 General:**

- This policy outlines the spirit behind the company's approach in bringing absolute transparency in communications as regards its policies. Therefore, personnel covered by this policy are expected to respect the rules and standard procedures governing this policy. Where circumstances are abnormal or situations not anticipated or defined in this policy arise, such matters should be referred to the HR Department for resolution in a matter that is consistent with the whole aim and spirit of this policy.
- Deviation to this policy in any form will not be entertained and will be viewed seriously.
- This policy supersedes all other policies, procedures, and practices prevalent on this subject till date. The company reserves the right to add to, alter to, amend, or cancel this policy at its discretion.

**Recommended By:**

**Approved By:**

**Sd/-  
Dr Rima Ghose Chowdhury  
Executive Vice President, CHRO & CSR Leader**

**Sd/-  
Rahul Kanodia  
Vice Chairman & CEO**