

## **ANTI-CORRUPTION POLICY**

The Anti-Corruption Policy (the ‘Policy’) of Khoji Minds India Pvt Ltd. (KMIPL) has been developed in accordance with Code of Conduct, charters, policies, rules and regulations adopted by KMIPL and in conformance with the legal and statutory framework of Anti-Corruption Legislation prevalent in India.

The Policy reflects the commitment of KMIPL and its management for high ethical standards doing open and fair business for improving the corporate culture, following the best practices of corporate governance and supporting the business reputation at the appropriate level.

### **1. PURPOSE AND OBJECTIVE**

I. The aims and objectives of the Policy are:

- ✓ to initiate the steps to reduce the bribery and corruption risks to the business of the Company by setting out clear guidelines.
- ✓ to encourage employees and Directors to be vigilant and to act diligently in good faith.
- ✓ monitoring and investigating instances of alleged corruption.
- ✓ taking firm and vigorous action against any individual(s) involved in corruption.
- ✓ to minimize the risk of involvement of all employees and Directors in corruption related activities;
- ✓ to form a common understanding for all stakeholders that KMIPL prevents the corruption in any form;
- ✓ to summarize and explain the key requirements of Indian anti-corruption regulations; and
- ✓ to set responsibility for the employees of KMIPL to know and comply with the principles and requirements of the Policy, the key rules of the applicable anti-corruption laws, as well as adequate procedures to prevent corruption.

## **2. SCOPE**

The Policy would be applicable to:

1. All employees (including off roll employees) and Directors of KMIPL,
2. All employees of subsidiaries of KMIPL, and
3. Partners and Representatives or any other persons/individuals, who may be acting on behalf of KMIPL.

## **3. KEY PRINCIPLES**

1. The Members of the Board of Directors, the President, the Board members and Senior Managerial Personnel of KMIPL should form the ethical standard of uncompromising attitude to all forms and demonstration of corruption at all levels setting the example by their own behaviour.
2. The Policy is available on the corporate website. KMIPL openly expresses its opposition to corruption; welcomes and encourages compliance with the principles and requirements of the Policy by all contractors, employees, associated parties/companies, its managerial bodies and other persons.

## **4. APPLICABLE ANTI-CORRUPTION LAWS AND KEY PROVISIONS**

The applicable Anti-Corruption Laws under the Indian Statutory Framework are as follows:

1. Indian Penal Code, 1860,
2. Prevention of Corruption Act, 1988,
3. Prevention of Money Laundering Act, 2002,
4. Right to Information Act, 2005,
5. Central Vigilance Commission Act,
6. Lok Ayukta Acts of States, and
7. Any other Act/statutes as may be notified by the Government of India from time to time.

## 5. RESTRICTED PRACTICES

Illustrative List of acts /practices which are restricted / prohibited under the policy framework is given below:

1. Dishonest misappropriation of property/money.
2. Criminal breach of trust.
3. Cheating.
4. Receiving or giving bribe.
5. Acceptance /giving of Gifts over and above the extent and the manner as allowed hereunder:-
  - (l) Gifts and representative expenses including the hospitality business expenses which the employee may provide on behalf of the Company to the individuals or organizations, or which the employees may receive in connection with their work in the Company from other persons and organizations, must meet a set of five criteria mentioned below:
    - (a) to be directly related to the legitimate activity of the Company, for example, a presentation or completion of business project(s), or the successful execution of contracts, or either with common holidays such as the Christmas, Diwali, New Year, International Women's Day, anniversaries, birthdays;
    - (b) to be reasonable, proportionate and not be a luxury;
    - (c) to be not a hidden fee for the service, act, omission, conniving, protection, provision of rights, making of certain decision on transaction, agreement, license, permit, etc. or attempt to influence the recipient to indulge in any illegal or unethical activity;

- (d) not to create a reputational risk for the Company, employees, and other persons, in case of disclosure of information on gifts or representative expenses;
  - (e) not to be in conflict with the principles and requirements of the Policy, the Code of Ethics, other internal documents of the Company and the rules of applicable law.
6. Charity in order to obtain commercial advantages.
  7. Participation/Contribution in/to Political Activities.
  8. Payment of any costs for government officers and their relatives (or in their interests) in order to obtain commercial advantages, and
  9. Any other unethical act or omission.
  10. To use partners, agents, joint ventures, intermediaries, or other persons for any actions that are contrary to the principles and requirements of the Policy or the rules of the applicable anti-corruption laws.

## **6. IMPLEMENTATION AND COMPLIANCE**

The policy would be implemented by order of the CEO of KMIPL. It is sole responsibility of the employees (including all persons/officials covered under the Policy) to abide by the Policy and to restrict their actions/conduct within the set framework of the Policy.

The compliance with the principles and requirements of the Policy by the employees would be taken into account during the course of their appraisal and sanction of promotions.

Compliance to this policy would be carried out time to time starting from the joining formalities - orientation program to appraisal cycles.

## **7. REPORTING AND ACTIONS**

Any violation/non-adherence of the Policy would be reported to the respective Executive Level Disciplinary Committee and the respective Committee will take appropriate action(s).

In case any employee or any other person to whom this policy applies, is found to be indulged in corruption related activities, violation of any provisions of the Policy or any frivolous complaint, he /she may be subject to disciplinary action(s) including termination of services and such other administrative, civil or criminal action(s) as per the applicable statutes as mentioned in the Policy.

The Executive Level Disciplinary Committees will be headed by the board and periodic review of practice would be carried out.

## **8. PROCEDURE FOR REPORTING OF VIOLATIONS**

### **I. Reporting against Employees /Officials/ Other Persons (including Partners / Representatives)**

When any employee or other persons doubt the legality or ethics of their actions or the action, inaction, violation, deficiencies or proposals of other employees, contractors or other persons, who act on behalf of KMIPL, they may report it by the following mode(s):

(a) [E-Mail: compliance@simplifit.in](mailto:compliance@simplifit.in)

(b) Telephone: +91 8826680042

(c) Direct Reporting: to Head of the Department of respective employee and/or to the CEO directly.

### **II. Reporting against Board Member(s)**

In case of alleged corruption in respect of Board member(s), the violation(s) would be reported to the CEO and/or Chairman of the Board and he/they shall take the appropriate action (s) as may be considered necessary.

It is the duty of the Head of Department, Board members to take all reasonable steps to protect the identity of the person(s), who has/have reported the violations. It is also their responsibility to take all reasonable steps to safeguard such information, which they come across during the reporting/investigation process, to use such information only for the reasons it was supplied and not to share it with third parties, unless in compliance with applicable laws and regulations.

## **9. RESPONSIBILITY FOR FAILURE (IMPROPER FULFILLMENT) OF THE POLICY**

The members of the Board of Directors, the President, the members of the Management Committee and employees of all functions of KMIPL, regardless of position and designation, are personally responsible for compliance with the principles and requirements of the Policy, as well as the actions (inaction) of their subordinates, who violate these principles and requirements.

## **10. POLICY INTRODUCTION AND COMMUNICATION**

All the employees shall receive regular, relevant information on how to implement and adhere to this Policy. The policy is provided at the joining and all employees are required to abide by the policy.

KMIPL's zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, agents and business and other partners at the outset of our relationship with them and as appropriate thereafter.

## **11. AMENDMENTS**

In case of identification of ineffective provisions of the Policy or related business processes of KMIPL or in case of change of the requirements of applicable laws or in case of any other modification(s), which may be deemed necessary by the CEO, the Policy may be amended / updated by issuing an order under the signature of the CEO.

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