

**NuSummit Technologies Private Limited****ANTI-BRIBERY AND CORRUPTION POLICY****Ver 1.0****Information Classification: Limited Access**

	Name	Designation	Date in DD/MM/YY
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**INTRODUCTION**

This policy is applicable for employees of NuSummit Technologies Pvt Ltd and its subsidiary Company Aujas Cybersecurity Ltd.

This Anti-Bribery and Corruption Policy (“the Policy”) applies to all directors, officers and employees (collectively, “you”) of NuSummit Technologies PVT LTD and its group companies.

This Policy should be read in conjunction with Code of Conduct on Darwin box which serves as a guide for how you should conduct yourself as a member of the NuSummit Technologies Pvt Ltd Team.

**ZERO TOLERANCE APPROACH TO BRIBERY**

***Do not give or receive bribes, including “facilitation payments”.***

We value our reputation for conducting business with honesty and integrity. It is vital for us to maintain this reputation as it generates confidence in our business by our customers, clients, investees and other persons – which ultimately means it is good for business.

We do not pay bribes in furtherance of our business and do not expect you do so on our behalf. We have a zero-tolerance approach towards bribery. This commitment comes from the highest levels of management, and you must meet this standard.

A bribe is anything of value that is offered, promised, given or received to influence a decision or to gain an improper or unfair advantage. Bribery may not always be in the form of cash payments and may take many other forms, including:

- Non-arm’s length loans or other transactions.
- Phony jobs or “consulting” relationships.
- Employment opportunities and internship
- Political contributions.

- Charitable contributions; or
- Gifts, travel, and hospitality.

Facilitation payments are also a form of bribe and are, therefore, not permitted. Facilitation payments are small payments made to secure or speed up routine actions or otherwise induce public officials or other third parties to perform routine functions they are otherwise obligated to perform, such as issuing permits, approving immigration documents or releasing goods held in customs. This does not include legally required or permitted administrative fees or fees to fast-track services.

## **DEALING WITH PUBLIC OFFICIALS**

### **Interactions with public officials require enhanced scrutiny and sensitivity**

A “public official” is any person who is employed by or is acting in an official capacity for a government, a department, agency or instrumentality of a government, or a public international organization. This includes elected or appointed persons who hold legislative, administrative or judicial positions such as politicians, bureaucrats, civil servants and judges. It also includes persons who perform public functions such as professionals working for public health agencies, water authorities, planning officials and agents of public international organizations such as the UN or World Bank. A “public official” may also include employees of government-owned or controlled businesses, including sovereign wealth funds. For example, if a government has an interest in a bank and exercises control over the activities of that bank, then the banking officials are likely to be considered “public officials”. There is increased sensitivity and scrutiny of dealings with public officials because this has traditionally been an area where bribery activity is more likely to occur. Be cognizant of these risks in your dealing and interactions with public officials and consider how your actions may be viewed. For example, payments, gift or employment to close relatives of public officials may be treated by enforcement authorities as direct payments to the public officials and, therefore, may constitute violations of law.

## **THIRD-PARTIES**

**Joint venture partners, agents, contractors and suppliers are not permitted to pay bribes on our behalf.**

The company may be prosecuted for failing to prevent bribery by a person associated with it. This includes any person or entity that performs services for or on behalf of the company. Employees should avoid doing business with partners, agents and contractors who do not have a zero-tolerance approach to bribery. This means due diligence should be undertaken on contractors, partners and agents to establish their anti-bribery credentials, where warranted by the assessed level of risk. This could include informing these persons (and associated companies) of the company’s anti-bribery policy, meeting with them to better assess their business practices, and making commercially reasonable inquiries into their reputation and past conduct. Anti-bribery language should be included in contractor, partner or agency agreements, where appropriate.

## GIFTS AND ENTERTAINMENT

**The giving or receiving of gifts and entertainment should be proportionate and reasonable for the circumstances.**

Gifts (e.g. merchandise, event tickets) given to or received from persons who have a business relationship with the company are generally acceptable, if the gift is modest in value, infrequent, appropriate to the business relationship, and does not create an appearance of impropriety. No cash payments should be given or received. In addition, gifts should not be given to or received from public officials. Entertainment (e.g. meals, tickets to sporting events or theatre) given to or received from persons who have a business relationship with the company are generally acceptable, if the entertainment is reasonable in value, appropriate to the business relationship, infrequent, does not create an appearance of impropriety and if a representative from the sponsoring organization (the party paying for the entertainment) is present at the event. Gifts and entertainment (including meals) that are repetitive, no matter how small, may be perceived to be an attempt to create an obligation to the giver and should be avoided. Gift or entertainment given close in time to when a decision impacting NuSummit Technologies Pvt Ltd business is being made may be perceived as a bribe in return for a favourable decision and should also be avoided. Employees should not pay for gifts and entertainment (including meals) personally to avoid having to report or seek approval for it.

Employees should not give or receive “big-ticket” items, such as travel, conference fees, costs for road shows, or event sponsorships, without prior written authorization from senior management (CEO/CFO / Head of Risk) or person(s) designated to provide such authorization. If you are in doubt as to whether gifts or entertainment proposed to be given or received are proportionate and reasonable for the circumstances, please consult NuSummit Technologies Pvt Ltd Risk Management Team at [erm\\_compliance@nusummit.com](mailto:erm_compliance@nusummit.com)

*Anti-corruption laws in India are, The Prevention of Corruption Act which seeks to establish a substantive offence for bribe giving which is to include not just constructively paying a bribe but the mere offer or promise to bribe a public servant as well. The punishment is minimum imprisonment to 3 years extendable up to 7 years along with a fine. It further establishes a substantive offence for bribery by commercial organisation, which also provides that when a commercial organisation is found guilty of the offence of bribery, all such persons who at the time at which the offence was committed were responsible or in charge of conducting the business of the organisation will also be guilty of the offence – and liable to a minimum imprisonment of three years – extendable to seven years, as well as a fine. Similarly, where the offence has been committed due to the consent or connivance or neglect of any director, manager, secretary or officer of the company, such person will also be held guilty of the offence. Also, the same person will be punished under Indian Penal Code, maximum upto two years’ imprisonment or fine or both.*

## POLITICAL DONATIONS AND LOBBYING

NuSummit Technologies Pvt Ltd does not offer contributions to political parties or candidates that might influence, or be perceived as influencing, a business decision. Any exceptions would need written approval by the CEO, CFO and Risk Head of NuSummit Technologies Pvt Ltd

## CHARITABLE DONATIONS

Do not solicit or offer donations to suppliers, vendors or public officials in a manner which communicates that a donation is a prerequisite for future business or that the offer of a donation is intended to obtain a business advantage.

We encourage our directors, officers and employees to contribute personal time and resources to charities and non-profit organizations. However, unless the solicitation is supported by the company, you are prohibited from using the company name or company stationery for solicitation of donations. All requests for corporate gifts to charities and other not-for-profit organizations should be approved in advance by the company's Senior Management (CEO/CFO /Risk Head) or person(s) designated to approve such donations. Charitable donations made by individuals on their own behalf should comply with local laws and regulations. If you are requested by a public official to make a personal donation to a particular charity, please consult with Senior Management (CEO/CFO/ Risk Head) or person(s) designated to approve such donations before agreeing to or making the donation. Any queries can be emailed to [erm\\_compliance@nusummit.com](mailto:erm_compliance@nusummit.com)

## RECORD-KEEPING

**Record all our transactions in a complete, accurate and detailed manner so that the purpose and amount of the transaction is clear.**

In addition to prohibiting bribery, some anti-bribery legislations require proper record-keeping and the establishment and maintenance of internal controls. The purpose of these provisions is to prevent companies from concealing bribes and to discourage fraudulent accounting practices. All transactions must be recorded completely, accurately and with sufficient detail so that the purpose and amount of any such payment is clear. No undisclosed or unrecorded funds or assets of the company should be established for any purpose. False, misleading, or artificial entries should never be made in the books and records of the company for any reason.

## REPORTS AND COMPLAINTS

Internal reporting is critical to the company's success, and it is both expected and valued. You are required to be proactive and promptly report any suspected violations of this Policy, or any illegal or unethical behaviour of which you become aware by emailing [erm\\_compliance@nusummit.com](mailto:erm_compliance@nusummit.com) or [whistleblower@nusummit.com](mailto:whistleblower@nusummit.com). The confidentiality of reported violations will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review and subject to applicable law. Complaints will be kept confidential and will be dealt with appropriately. You will not experience retribution or retaliation for a complaint made in "good faith".

**Disciplinary Action for Policy Violations** Please note that we reserve the right to take disciplinary action for Policy violations that fits the nature and particular facts of the violation. This could, in the most severe circumstances, include immediate termination for cause and, if warranted, legal proceedings may be brought against you. HR Head and Risk Head will take a final call on the disciplinary action to be taken.

To summarize, as a general rule, "anything of value" offered, promised or given to a recipient,

directly or indirectly, in order to induce or reward the improper performance of, or the failure to perform, a function or an activity, can be considered a bribe. In all instances, whether an action will be considered a bribe will depend on whether it was presented for the wrong reasons. Bribes come in many forms and activity may be construed as illegal anytime there is the giving or receiving of an undue reward to influence another party's behavior. The Company prohibits any employee or director (or anyone acting on their behalf) from (1) soliciting anything of value for themselves or for any other individual from anyone in return for any business, service or disclosure of confidential information; and (2) accepting anything of value from anyone other than the Company in connection with conducting the Company business, except as may specifically be permitted by the Code or applicable policy.

If you have any questions on this policy, please email [erm\\_compliance@nusummit.com](mailto:erm_compliance@nusummit.com).