

ANTI-CORRUPTION POLICY OF SIGNATUREGLOBAL (INDIA) LIMITED

(Formerly known as Signatureglobal (India) Private limited)

(Approved by the ESG Committee on 03.03.2024)

Anti-Corruption Policy

Updated: 03rd March 2025

1. Objective

Signatureglobal (India) Limited (“the Company”) is committed to maintaining the highest standards of integrity, transparency, and accountability in all its business dealings. This Anti-Corruption Policy outlines the principles and procedures we adopt to prevent bribery, corruption, facilitation payments, and other unethical practices across our operations and supply chain.

2. Applicability

This policy applies to all employees (permanent, contractual, or temporary), directors, consultants, agents, vendors, contractors, and business associates acting on behalf of the Company across all geographies.

3. Guiding Principles

This policy is formulated in alignment with:

- The **Prevention of Corruption Act, 1988** (as amended)
 - The **Companies Act, 2013 along with Schedule IV (including the Code of Independent Directors)**
 - International standards such as the **World Economic Forum’s Partnering Against Corruption Initiative** and **Transparency International’s Business Principles for Countering Bribery**
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4. Prohibited Practices

4.1 Bribery & Kickbacks

- No employee or representative may offer, solicit, accept, or authorise any payment, benefit, or favour that may be construed as a bribe or kickback.
- “Facilitation payments” — unofficial payments to expedite routine processes — are strictly prohibited.

4.2 Solicitation of Advantage

Employees are not permitted to solicit gifts, money, discounts, services, or favours from suppliers, contractors, clients, or government officials.

4.3 Acceptance of Gifts & Hospitality

- Employees may only accept token non-cash gifts or hospitality (e.g., festive hampers, business lunches) provided they are:
 - Not intended to influence a business decision
 - Declared to HR and recorded appropriately
- Cash gifts, high-value items, travel reimbursements, or lavish entertainment offers must be declined and reported.

4.4 Offering Advantages

Offering business gifts, hospitality, or sponsorships must be pre-approved and must comply with the **Group’s Code of Conduct and Gifts Policy**. All charitable donations or sponsorships must be transparently recorded and vetted for legitimacy.

5. Conflict of Interest

All employees are expected to act in the best interest of the Company. A conflict of interest arises when personal relationships, financial interests, or affiliations impair an individual’s objectivity. Any real or perceived conflict must be disclosed to the Compliance Officer.

6. Training & Awareness

- All employees shall undergo mandatory **anti-bribery and ethics training** at induction and periodically thereafter.
 - Department Heads are responsible for cascading this policy across teams, partners, and intermediaries.
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7. Monitoring, Audit, and Reporting

- Signatureglobal (India) Limited will carry out periodic **internal audits**, risk assessments, and compliance reviews.
- Employees are encouraged to report suspected violations anonymously via the **Whistleblower Mechanism**.
- The Company shall take **disciplinary action** against any individual found to be involved in corrupt practices, up to and including termination and legal prosecution.

8. Governance and Review

This policy shall be reviewed annually by the delegated ESG Steering Committee (also known as the ESG Committee) and updated as necessary to ensure compliance with legal, ethical, and operational changes.