



**ANTI-CORRUPTION
AND
ANTI-BRIBERY POLICY DOCUMENT**

At Shellinfosg Global Digital Technologies Private Limited (SGDT), we are unwavering in our commitment to conducting business with integrity, transparency, and ethical standards. We maintain a zero-tolerance policy towards all forms of corruption and bribery.

This policy applies to all employees, directors, officers, agents, contractors, and third-party representatives acting on behalf of SGDT, regardless of their location or function. Everyone associated with SGDT is expected to uphold this standard and comply fully with all applicable domestic and international anti-corruption laws, including those that prohibit bribery of public officials or private individuals, improper payments or inducements, offering or accepting gifts, hospitality, or other benefits intended to influence business decisions.

The Anti-Corruption and Anti-Bribery Policy is designed to ensure that all parties working with or for SGDT clearly understand their responsibilities and act in accordance with the highest standards of legal and ethical conduct in all business dealings.

1. Scope

This Anti-Corruption and Anti-Bribery Policy applies to:

- All employees, including full-time, part-time, temporary, and contractual staff;
- Directors, officers, and senior management of Shellinfosg Global Digital Technologies Private Limited;
- Consultants, contractors, and interns engaged by or on behalf of the Company;
- Third-party representatives, such as agents, distributors, business partners, suppliers, and joint venture partners acting for or in collaboration with SGDT;
- All geographical locations and jurisdictions in which SGDT operates.

Every individual covered by this policy is personally responsible for ensuring compliance with ethical business practices in all interactions and transactions related to the Company. Adhering to the principles outlined in this policy is essential to protecting the integrity, reputation, and long-term success of Shellinfosg Global Digital Technologies Private Limited.

2. Policy Statement

Shellinfosg Global Digital Technologies Private Limited (SGDT) upholds a strict **zero-tolerance policy** against corruption, bribery, and any unethical business practices. Offering, providing, soliciting, or accepting bribes, kickbacks, or improper payments in any form to influence business decisions is strictly prohibited. Any violation of this policy may result in severe disciplinary action, including termination of employment and legal consequences.

Key principles include:

- Prohibition of Bribes:** Bribery in any form—whether through payments, gifts, favors, or anything of value—is strictly prohibited. This includes any attempt to influence a business decision or gain an improper advantage, directly or indirectly.
- Compliance with Laws:** All business dealings must comply with applicable anti-corruption laws, including but not limited to the Prevention of Corruption Act, 1988 (India), the UK Bribery Act 2010, and the US Foreign Corrupt Practices Act (FCPA), Any other applicable local or international regulations.
- Facilitation Payments:** Facilitation payments—informal or small payments made to expedite routine governmental actions—are strictly prohibited under SGDT policy, except in cases where refusal to pay may pose a serious threat to personal safety. Any such exception must be reported and documented immediately.

iv. Gifts and Hospitality:

- Gifts, entertainment, or hospitality must never be used to influence, or appear to influence, any business decision.
- All such offerings must be modest, infrequent, appropriate, and fully compliant with SGDT's Policy.
- Employees must not accept or offer cash or cash equivalents, personal favors, items that create or could create a conflict of interest.
- All gifts and hospitality must be clearly documented and, where necessary, pre-approved by relevant authorities within the Company,

v. Charitable Contributions: Donations and sponsorships are permitted only when they are ethical, transparent, proper documentation and prior approvals are in place and not intended to secure a business advantage.**vi. Political Contributions:** SGDT prohibits any political donations or contributions to candidates, parties, or political campaigns as a means of securing or retaining business advantage. This includes indirect contributions through third parties or entities.**3. Responsibilities**

To uphold SGDT's zero-tolerance stance on bribery and corruption, clear responsibilities are assigned to all employees, third parties, and management personnel. All employees and associated third parties must:

- Understand and comply with this Policy and all applicable anti-corruption laws.
- Report any suspected violations or corrupt practices immediately to the Compliance Officer or via the designated reporting channels.
- Refrain from engaging in or facilitating any corrupt activities or conduct that violates this Policy.
- Notify their manager or HR if they are ever pressured, coerced, or asked to participate in unethical or corrupt practices.
- Identify and report suspicious activity that may suggest potential bribery, improper influence, or unethical behavior

Management must:

- Demonstrate ethical leadership by setting a clear example of integrity and compliance in all business dealings.
- Ensure effective communication and dissemination of this Policy to all employees, contractors, and relevant business partners
- Facilitate regular training and awareness programs on anti-bribery and anti-corruption practices.
- Monitor compliance within their departments and take immediate corrective action when breaches are identified.
- Support a culture of transparency and accountability, ensuring that employees feel safe to report concerns without fear of retaliation.

4. Reporting and Whistleblowing

SGDT is committed to fostering a transparent and ethical work environment. Employees and associated persons are encouraged to report any concerns or suspected violations of this Anti-Corruption and Anti-Bribery Policy without fear of retaliation.

- **Reporting Suspected Misconduct:** If you suspect or are aware of any act of bribery, corruption, or unethical behavior:
 - a. Immediately report it to your Reporting Manager and the HR Department.
 - b. Alternatively, you may report concerns anonymously through SGDT's whistleblowing channels.
- **Reporting Channels:** Email: compliance@shellinfoglobal.com

All reports will be handled confidentially and investigated promptly and fairly by the appropriate internal authorities followed by appropriate corrective action where necessary.

- **Whistleblower Protection:**
 - a. SGDT prohibits retaliation against any individual who, in good faith, reports a concern or suspected violation.
 - b. Individuals raising concerns will be protected from discrimination, victimization, or any form of harassment.
 - c. Anonymous reports will be accepted and taken seriously, provided sufficient information is provided to allow a proper investigation.

5. Monitoring and Enforcement

SGDT is committed to ensuring that this Anti-Corruption and Anti-Bribery Policy is effectively implemented and consistently upheld across all areas of operation.

- a. **To ensure ongoing compliance:**
 - SGDT will conduct regular audits and assessments to review adherence to this Policy and identify any areas of concern.
 - Periodic reviews of internal processes, transactions, and business relationships will be carried out to detect and deter any corrupt practices.
- b. **Enforcement:**
 - All reported or suspected violations of this Policy will be thoroughly investigated by the designated compliance authorities
 - Investigations will be conducted in a fair, impartial, and confidential manner.
- c. **Disciplinary Action:**
 - If an individual or associated third party is found to be in violation of this Policy, appropriate disciplinary measures will be taken
 - Disciplinary actions may include, but are not limited to:
 - ✓ Formal warnings
 - ✓ Suspension
 - ✓ Termination of employment or contractual agreement
 - ✓ Legal action, if warranted under applicable law

SGDT maintains a zero-tolerance stance toward corruption and bribery and will not hesitate to take strong action to protect its values, integrity, and reputation.

6. Training and Communication

To ensure effective implementation of this Policy, SGDT will provide ongoing training and support to all relevant stakeholders.

7. Review and Updates

This policy will be reviewed periodically to ensure its effectiveness and compliance with evolving laws and best practices. Updates or revisions will be communicated to all employees.
