

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

What does your policy cover?

This anti-bribery policy exists to set out the responsibilities of **Neoinfinit Multicons Pvt Ltd** and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for **Neoinfinit Multicons Pvt Ltd**. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

Policy statement

Neoinfinit Multicons Pvt Ltd is committed to conducting business in an ethical and honest manner and is committed to implementing and enforcing systems that ensure bribery is prevented. **Neoinfinit Multicons Pvt Ltd** has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever in the country we operate.

Neoinfinit Multicons Pvt Ltd will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the land in regards to our conduct both at home and abroad.

Neoinfinit Multicons Pvt Ltd recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face severe damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business and take our legal responsibilities seriously.

Who is covered by the policy?

This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the country). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.

In the context of this policy, a third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

Any arrangements our company makes with a third party are subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

Gifts and Hospitality

Neoinfinit Multicons Pvt Ltd accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the stated requirements in the policy.

Where it is inappropriate to decline the offer of a gift, the gift may be accepted so long as it is declared to the compliance manager, who will assess the circumstances.

Neoinfinit Multicons Pvt Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions.

Facilitation Payments and Kickbacks

Neoinfinit Multicons Pvt Ltd does not accept and will not make any form of facilitation payments of any nature.

Neoinfinit Multicons Pvt Ltd does not allow kickbacks to be made or accepted.

Neoinfinit Multicons Pvt Ltd recognises that despite our strict policy, employees may face situations involving personal security risk, and proper reporting procedures must be followed.

Political Contributions

Neoinfinit Multicons Pvt Ltd will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates.

Charitable Contributions

Neoinfinit Multicons Pvt Ltd accepts and encourages charitable donations and agrees to disclose all charitable contributions it makes.

Employee Responsibilities

As an employee of **Neoinfinit Multicons Pvt Ltd**, you must ensure that you read, understand, and comply with this policy.

If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. **Neoinfinit Multicons Pvt Ltd** has the right to terminate a contractual relationship with an employee if they breach this anti-bribery policy.

Raising a Concern

If you suspect bribery or corruption in relation to **Neoinfinit Multicons Pvt Ltd**, you are encouraged to raise your concerns as early as possible.

Neoinfinit Multicons Pvt Ltd will familiarise all employees with its whistleblowing procedures.

If you refuse to accept or offer a bribe or report a concern, **Neoinfinit Multicons Pvt Ltd** will support you and ensure no detrimental treatment occurs.

Training and Communication

Neoinfinit Multicons Pvt Ltd will provide training on this policy as part of the induction process and regular ongoing training thereafter.

The anti-bribery and corruption policy and zero-tolerance attitude of **Neoinfinit Multicons Pvt Ltd** will be clearly communicated to all suppliers, contractors, business partners, and third parties.

Record Keeping

Neoinfinit Multicons Pvt Ltd will keep detailed and accurate financial records and appropriate internal controls to act as evidence for all payments made.

Monitoring and Reviewing

Neoinfinit Multicons Pvt Ltd's compliance manager is responsible for monitoring the effectiveness of this policy and reviewing its implementation regularly.

This policy does not form part of an employee's contract of employment, and **Neoinfinit Multicons Pvt Ltd** may amend it at any time to improve its effectiveness in combating bribery and corruption.

