

ANTI BRIBERY POLICY

ONWARD TECHNOLOGIES



ONWARD-HRO-P03: ANTI BRIBERY POLICY

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1.0 PURPOSE

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

2.0 SCOPE

The policy applies to all permanent employees, trainees, interns, contractors, and other individuals working in a non-permanent capacity in the company across all entities/geographies of Onward Tech.

3.0 OWNERSHIP/IMPLEMENTATION

The ownership & implementation of this policy lies with the HR Team and will be effective from the **01st January, 2023** & will continue to be in force unless superseded by a revised policy. The HR Department reserves the right to amend, abrogate & reinstate the entire policy or any part of it as & when it deems necessary.

4.0 POLICY

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided to gain any commercial, contractual, regulatory, or personal advantage.

Onward Tech takes a zero- tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

This Policy covers:

- Bribes;
- Gifts;
- Facilitation payments;
- Political contributions;
- Charitable contributions.

4.1 Bribes

Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor). Specifically, employees must not bribe a foreign public official anywhere in the world.

4.2 Gifts & Hospitality

Employees are not encouraged to offer or give any gift from fellow colleagues however in situations where for due to social reasons etc. it should not exceed the value of INR 1,000 for India or \$50 or equivalent currency (in case of overseas locations).

4.3 Facilitation Payments & Kickbacks

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage.

4.4 Political Contributions

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

4.5 Charitable Contributions

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the compliance manager. All charitable contributions should be publicly disclosed.

5.0 Employee Obligations

Every employee must ensure that they read, understand, and comply with this policy.

6.0 Training & Communication

Training on this policy forms part of the induction process for all new employees. Our zero-tolerance approach to bribery and corruption must be communicated to all customers, clients, vendors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Thanking You - HR Department

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