




## ANTI CORRUPTION POLICY

	Name	Function	Signature	Date
Prepared By	Amarnath.s	Quality Assurance		17 <sup>th</sup> July 2021
Reviewed By	Bhuvana A	Quality Assurance		17 <sup>th</sup> July 2021
Approved By	Vidyawati Kulkarni	Quality Assurance		17 <sup>th</sup> July 2021

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 Document control information

Ver. No.	Description of Change	Prepared By	Reviewed By	Approved By	Effective Date
1.0	Initial Version	Manjunath Prabhu	-	Visweswara Rao	25 <sup>th</sup> May 2015
1.1	Updated with the latest template	Manjunath D	-	Roopa Rajesh	1 <sup>st</sup> Mar 2017
2.0	Company name changed from AXISCADES Engineering Technologies Ltd to AXISCADES Technologies Ltd	Amarnath.s	Bhuvana A	Vidyawati Kulkarni	17 <sup>th</sup> July 2021

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## OBJECTIVE:

AXISCADES is committed towards the prevention of Anti-Corruption, Fraud, bribery & other corrupt business practices. The purpose of the Anti-Corruption Policy is to reiterate AXISCADES commitment to full compliance by the Company and its directors and employees.

## SCOPE:

The Anti-corruption policy is applicable to every employee working with AXISCADES (whether permanent, Sub-Contractor, Direct-Contractor) This Policy is intended to supplement all applicable laws, rules, and other corporate policies. It is not intended to supplant any local laws.

## POLICY DETAILS:

### Definition:

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for Private gain. It is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. This is considered as Corruption & illegal. The types of Corruption include:

### Commercial Bribery:

The receipt of bribes or personal payments by company employees, or by spouse, family or friends on behalf of the employee, from suppliers, contractors, contract workmen, customers, other employees, government staff or any other person or body will be treated as a violation of the Anti-Corruption policy. Any attempt to bribe an employee must also be reported to the management.

### Receiving Favors, Gifts & Hospitality:

No employee shall receive any gift, favor or hospitality from any person, be it a contractor, supplier, customer etc. Receiving of favors or hospitality which may be of value personally to the individual is strictly prohibited, even though the same may not have a commercial value. An example of this would be a contractor securing admission to a school for the child of an employee.

### Fraud & Dishonesty in transaction:

The Company policy prohibits fraud, and establishes procedures to be followed concerning the recognition, reporting and investigation of suspected fraud. Fraud includes, but is not limited to:

- Dishonest or fraudulent act
- Theft of Company property, including information
- Forgery or alteration of negotiable instruments such as Company cheques and drafts
- Conversion to personal use of cash, securities, supplies or any other Company asset

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- Using Company resources for personal benefit. For example asking a Company employee to carry out some personal work in one's residence.
  - Unauthorized handling or reporting of Company transactions; and Falsification of Company records or financial statements for personal or other reasons.
  - Tapping/ intercepting telephone/ mobile conversations and passing on the same to outsiders or to any person not authorized to receive such information.

**DICIPLINARY ACTIONS:**

Any employee who violates the terms of this policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this policy but fails to report such potential violations to company management will be subject to disciplinary action. In all cases disciplinary action may include termination of employment.