

The Anti-Corruption Policy (the 'Policy') of SGS TEKNIKS has been developed in accordance with Code of Conduct, policies, rules and regulations adopted by SGS TEKNIKS and in conformance with the legal and statutory framework of Anti-Corruption Legislation prevalent in India .

The Policy reflects the commitment of SGS TEKNIKS and its management for high ethical standards doing open and fair business for improving the corporate culture, following the best practices of corporate governance and supporting the business reputation at the appropriate level.

1. Purpose and Objectives

The aims and objectives of the Policy are:

1. To initiate the steps to reduce the bribery and corruption risks to the business of the Company by setting out clear guidelines.
2. To encourage employees and management to be vigilant and to act diligently in good faith.
3. Monitoring and investigating instances of alleged corruption.
4. Taking firm and vigorous action against any individual(s) involved in corruption.
5. To minimize the risk of involvement of all employees and management in corruption related activities.
6. To form a common understanding for all stakeholders that SGS TEKNIKS prevents the corruption in any form.
7. To summarize and explain the key requirements of Indian anti-corruption regulations.
8. To set responsibility for the employees of SGS TEKNIKS to know and comply with the principles and requirements of the Policy, the key rules of the applicable anti-corruption laws, as well as adequate procedures to prevent corruption.

2. Scope

The Policy would be applicable to:

1. All employees and managements of SGS TEKNIKS
2. Representatives or any other persons/individuals, who may be acting on behalf of SGS TEKNIKS.

3. Key Principles

1. The Senior Managerial Personnel of SGS TEKNIKS should form the ethical standard of uncompromising attitude to all forms and demonstration of corruption at all levels setting the

example by their own behavior.

2. The Policy is available on the Notice Board. SGS TEKNIKS openly expresses its opposition to corruption; welcomes and encourages compliance with the principles and requirements of the Policy by all contractors, employees, associated parties/companies, its managerial bodies and other persons.

4. Applicable Anticorruption Law & Key Provisions

The applicable Anti-Corruption Laws under the Indian Statutory Framework are as follows:

1. Indian Penal Code, 1860,
2. Prevention of Corruption Act, 1988,
3. Prevention of Money Laundering Act, 2002,
4. Right to Information Act, 2005,
5. Central Vigilance Commission Act,
6. Lok Ayukta Acts of States, and Any other Act/statutes as may be notified by the Government of India from time to time.

5. Restricted Practices

Illustrative List of acts /practices which are restricted / prohibited under the policy framework is given below:

1. Dishonest misappropriation of property/money.
2. Criminal breach of trust.
3. Cheating.
4. Receiving or giving bribe.
5. Acceptance /giving of Gifts over and above the extent and the manner as allowed hereunder:-
 - A. Gifts and representative expenses including the hospitality business expenses which the employee may provide on behalf of the Company to the individuals or organizations, or which the employees may receive in connection with their work in the Company from other persons and organizations, must meet a set of five criteria mentioned below:

- i. to be directly related to the legitimate activity of the Company, for example, a presentation or completion of business project(s), or the successful execution of contracts, or either with common holidays such as the Christmas, Diwali ,New Year, anniversaries, birthdays;
 - ii. to be reasonable, proportionate and not be a luxury;
 - iii. to be not a hidden fee for the service, act, omission, conniving, protection, provision of rights, making of certain decision on transaction, agreement, license, permit, etc. or attempt to influence the recipient to indulge in any illegal or unethical activity;
 - iv. Not to create a reputational risk for the Company, employees, and other persons, in case of disclosure of information on gifts or representative expenses;
 - v. Not to be in conflict with the principles and requirements of the Policy, the Code of Ethics, other internal documents of the Company and the rules of applicable law.
 - B. Gifts on behalf of the Company, its employees and representatives to third parties in the form of cash or non-cash in any currency, is not allowed.
6. Charity in order to obtain commercial advantages.
 7. Participation/Contribution in/to Political Activities.
 8. Payment of any costs for government officers and their relatives (or in their interests) in order to obtain commercial advantages, and
 9. Any other unethical act or omission.
 10. To use partners, agents, joint ventures, intermediaries, or other persons for any actions that are contrary to the principles and requirements of the Policy or the rules of the applicable anti-corruption laws.

6. Implementation & Compliance

The policy would be implemented by order of the Management of SGSTEKNIKS. It is sole responsibility of the employees (including all persons/officials covered under the Policy) to abide by the Policy and to restrict their actions/conduct within the set framework of the Policy. The compliance with the principles and requirements of the Policy by the employees

would be taken into account during the course of their appraisal and sanction of promotions.

7. Reporting & Actions

Any violation/non-adherence of the Policy would be reported to the Head of Department/CEO/Proprietor and the respective person will take appropriate action(s). In case any employee or any other person to whom this policy applies, is found to be indulged in corruption related activities, violation of any provisions of the Policy or any frivolous complaint, he /she may be subject to disciplinary action(s) including termination of services and such other administrative, civil or criminal action(s) as per the applicable statutes as mentioned in the Policy.

8. Procedures for Reporting of Violations

I. Reporting against Employees /Officials/ Other Persons / representatives)

When any employee or other persons doubt the legality or ethics of their actions or the action, inaction, violation, deficiencies or proposals of other employees, contractors or other persons, who act on behalf of SGS TEKNIKS, they may report it by the following mode(s):

E-Mail: ranjit@sgst.com, ok.mishra@sgst.com

(a) Telephone: 0124- 4760973, 4628800

(b) Direct Reporting: to Head of the Department of respective employee.

The Head of Department / will communicate all violations to the respective works Committee, which have been reported by the employees.

II. Reporting against Management(s)

In case of alleged corruption in respect of head of Department(s), the violation(s) would be reported to the President / CEO / Director, they shall take the appropriate action (s) as may be considered necessary.

It is the duty of the Head of Department, to take all reasonable steps to protect the identity of the person(s), who has/have reported the violations. It is also their responsibility to take all reasonable steps to safeguard such information, which they come across during the reporting/investigation process, to use such information only for the reasons it was supplied and not to share it with third parties, unless in compliance with applicable laws and regulations.

9. Responsibility for Failure (Improper fulfilment) of the policy

The Management Committee and employees of all functions of SGS TEKNIKS, regardless of position and designation, are personally responsible for compliance with the principles and requirements of the Policy, as well as the actions (inaction) of their subordinates, who violate these principles and requirements.

10. Amendments

In case of identification of ineffective provisions of the Policy or related business processes of SGS TEKNIKS or in case of change of the requirements of applicable laws or in case of any other modification(s), which may be deemed necessary by the Management, the Policy may be amended/ updated by issuing an order under the signature of the Management.