



ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

OF

S.J.S. ENTERPRISES LIMITED

1. OBJECTIVE

S.J.S. Enterprises Limited (“Company”) is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is the policy of the Company to conduct all of its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its business practice, wherever it operates throughout the world, of not engaging in bribery or corruption. As part of this commitment, the Company has implemented this **Anti-Bribery and Anti-Corruption Policy (“Policy”)** to prohibit bribery and corruption in any form and to ensure that the business is conducted with transparency and accountability.

The Board had adopted this Policy at its meeting held on 27th March, 2023.

2. SCOPE

This policy applies to all directors, employees, agents, consultants, contractors, and any other individuals acting on behalf of the Company and its Subsidiaries, wherever they may be located (collectively referred to as “you” in this Policy).

3. PROHIBITION OF BRIBERY AND CORRUPTION

- **Bribe:** You must not engage in any form of bribery, in dealings with any foreign/ public official, private party or any Third party either directly or indirectly, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the Company.
- **Kickback:** You must not make or accept kickbacks. Kickbacks are typically payments made in return for a business favor or advantage. A kickback is a form of corruption that involves two parties agreeing that a portion of their sales or profits will be kicked back (given back) to the purchasing party, in exchange for making the deal.
- **Facilitation payment:** You must not make facilitation payments also known as "grease payments". Certain countries may have a practice of ‘facilitation payments’, which are payments to government officials to expedite or ensure routine actions, such as issuing visas, work permits, licenses etc. We do not partake in any of these, nor do we allow Third parties acting on our behalf, such as merchants, vendors, agents, customers, consultants, alliance partners, suppliers and contractors to make any such payments.
- **Willful blindness:** If you willfully ignore or turn a blind eye to any evidence of corruption or bribery within your department and/or around you, it will be taken seriously against you. Although such conduct may be “passive”, i.e. you may not have directly participated in or may not have directly benefited from, the corruption or bribery concerned, the willful blindness to the same can, depending upon the circumstances, carry the same disciplinary action as an intentional act.
- **Gifts & hospitality:** Gifts and hospitality may be given or received only if they are of nominal value, are consistent with customary business practices and do not violate any laws and regulations. Gifts or hospitality that are intended to influence or reward any business decision or action are strictly

prohibited. The Company prohibits the acceptance of lavish gifts or hospitality that could create a sense of obligation or appear to influence business decisions.

- **Political contributions:** The Company is apolitical. The Company respects all of your rights to engage in political activities in personal capacity, provided we do not act, or give the impression of acting, as a representative of the Company and do it solely in personal capacity. The Company will not make donations or contributions, whether in cash or kind, in support of any political parties or candidates.
- **Charitable donations:** As part of its Corporate Social Responsibility, the Company may support local charities or provide sponsorship, for example, for sporting or cultural events. We only make charitable donations that are legal and ethical under local laws and practices and also within the corporate governance framework of the organization.
- **Dealing with Third parties:** The Company understands that various applicable anti-bribery and anti-corruption laws makes it responsible for the acts of its Third parties and others acting on its behalf. Therefore, no third party, acting on behalf of the Company may engage in any act that could be construed as bribery or corruption, whether using the Company's funds or their own personal funds or whether acting directly or through a middleman. The Company expects all those acting on our behalf to abide by our standards of ethics and integrity and where necessary and appropriate, to follow our procedures. While engaging with Third parties, you should ensure that they comply with the Company's Anti-Bribery and Anti-Corruption Policy. If any of you become aware that the Third party is engaged in bribery or corruption, you should immediately report your concern, following the procedure set out in "Whistle-Blower Policy" of the Company.
- **Prohibition of Insider Trading:** You shall not buy, sell or otherwise deal in the Company's securities if you have unpublished price sensitive information about or concerning the Company and/or its subsidiaries and affiliates. You hereby agrees that you shall not pass such information to third parties as it is not only a breach of confidentiality but also an offence.

4. PROCEDURE TO RAISE CONCERNS

Every person/s, to whom this policy applies, is encouraged to raise their concerns about any bribery issue or suspicion of malpractice at the earliest possible stage. If he/ she is unsure whether a particular act constitutes bribery or corruption or if he / she has any other queries, these should be raised with their respective Manager through hand written mode or through E-mail or he/ she should immediately report his/her concern following the procedure set out in "Whistle-Blower Policy" of the Company.

5. RECORD-KEEPING

The Company maintains accurate and complete records of all business transactions, including financial and accounting records, in accordance with applicable laws and regulations. The Company prohibits the creation of false or misleading records or the destruction of records in an attempt to conceal illegal or unethical behavior.

6. TRAINING AND COMMUNICATION

The Company provides regular training and awareness programs to employees and others acting on behalf of the Company regarding this policy and the laws and regulations related to bribery and corruption.

7. CONSEQUENCES OF VIOLATIONS

Violation of this policy may result in disciplinary action, up to and including termination of employment, as well as civil or criminal penalties. Any employee who violates this policy may also be subject to personal liability for their actions.

8. REVIEW

The Company is committed to maintaining the highest standards of integrity and ethical behavior. This Anti-Bribery and Corruption Policy is intended to provide guidance to all employees and others acting on behalf of the Company to ensure compliance with applicable laws and regulations and to promote a culture of transparency and accountability. The Company will continuously review and update this policy to ensure that it remains effective and relevant.