

## **SOFTVAN LIMITED**

### **Anti-corruption or Anti-Bribery Policy**

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#### **1. INTRODUCTION & PURPOSE**

This policy is designed to facilitate compliance with the Anti-Corruption laws in India. The Softvan Limited (“Company”) is committed to conducting all business activities with integrity and the highest possible ethical standards. The company has no tolerance for bribery and corruption.

#### **2. SCOPE**

This Policy applies to all employees of the Company.

#### **3. POLICY STATEMENTS**

- Employees should not take any action that could be directly or indirectly interpreted as an attempt to bribe, should not accept a bribe, or engage in any corrupt activities.
- Employees must apply reasonable and appropriate due diligence to ensure third parties do not participate in bribery or corrupt transactions.
- Employees must escalate bribery and corruption issues to the appropriate level of management.

#### **4. POLICY DETAILS**

##### **4.1 Bribery and Corruption Risks**

- a) Employees should refrain from offering, promising, giving, or accepting expensive gifts (whether directly or indirectly) to improperly encourage or reward any business or company activity.

**b) Political Contributions:**

The political contributions to any political parties will be in accordance with the law.

**c) Charitable Contributions:**

As part of Corporate Social Responsibility, Company may support local charities, provide sponsorship and only engage in charitable contributions that are legal and ethical under the law.

Contributions must be given only to bonafide charities and must not relate to obtaining or retaining business. Charitable contributions must not be made in cash and must be appropriately recorded in the Company’s books and records.

**d) Hiring Practices and Internships:**

Applicants for a job or internship must be selected through the formal Human Resources recruiting process and hired based on objective criteria and the candidate's credentials.

**4.2 Violations**

Employees who violate this Policy, may be subject to disciplinary action, up to and including termination of employment.

The Policy was approved by the Board of Directors of the Company dated 30<sup>th</sup> March, 2025 and will be effective from the date of listing on stock exchange. The Policy will be reviewed as and when required to meets the objectives of the relevant legislation.

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