**Antier Solutions Anti-Corruption and Anti-Bribery Policy**

## 1. Purpose

Antier Solutions is firmly committed to conducting all of its business operations with integrity, transparency, and the highest ethical standards. This policy is designed to ensure compliance with applicable anti-bribery and anti-corruption laws and to promote a zero-tolerance culture toward all forms of bribery, corruption, or unethical business conduct.

## 2. Scope

This policy applies globally and encompasses all individuals associated with Antier Solutions and its subsidiaries, including but not limited to:

* Directors and Board Members
* Executive Leadership and Senior Management
* Full-time, Part-time, and Contract Employees
* Temporary Staff, Interns, and Trainees
* Consultants and Advisors
* Agents, Vendors, Distributors, and Business Partners
* Third-party representatives, including subcontractors and joint venture partners

Regardless of location, all employees and stakeholders are expected to uphold the principles outlined in this policy.

## 3. Definition of Bribery and Corruption

* **Bribery** is defined as offering, promising, giving, or receiving anything of value (such as gifts, loans, fees, hospitality, services, or any benefit) to influence an official action or secure an improper advantage in business dealings.
* **Corruption** includes bribery and other dishonest or fraudulent conduct intended to obtain an unfair benefit or abuse of entrusted power for personal or organizational gain.

Bribery and corruption can occur in both public and private sector transactions and are strictly prohibited under this policy.

## 4. Core Principles and Responsibilities

### 4.1 Zero Tolerance Policy

Antier strictly prohibits all forms of bribery and corruption in any part of our business operations, regardless of local practices or cultural expectations. Bribery, in any form—direct, indirect, active, or passive—is never acceptable.

### 4.2 Individual Responsibilities

All employees and stakeholders are expected to:

* Act with honesty, transparency, and integrity at all times.
* Avoid any activities that could lead to, or appear to involve, bribery or corruption.
* Immediately report any suspicion, knowledge, or concern related to potential policy violations.

### 4.3 Management Responsibilities

Managers are expected to:

* Set an example through ethical behavior and compliance.
* Promote awareness and understanding of this policy among their teams.
* Ensure controls are in place to prevent and detect corrupt practices.

## 5. Prohibited Conduct

The following activities are expressly forbidden under this policy:

* Offering or accepting bribes in any form (money, gifts, entertainment, favors, employment opportunities, etc.).
* Using a third party to indirectly engage in bribery or corrupt acts.
* Making facilitation payments to expedite routine governmental actions.
* Providing kickbacks or secret commissions to win or retain business.
* Attempting to influence public officials or regulatory bodies unlawfully.
* Ignoring, concealing, or failing to report suspected violations.

## 6. Gifts, Hospitality & Entertainment

While reasonable gifts and hospitality may be acceptable in specific cultural or business contexts, they must:

* Be modest in value and infrequent.
* Not be offered or accepted with the intent of influencing decision-making.
* Be declared and approved according to company guidelines.
* Never include cash or cash equivalents.

Any gift or hospitality that could be construed as a bribe is strictly prohibited.

## 7. Due Diligence and Third Parties

Antier shall conduct appropriate due diligence before engaging with third parties, including vendors, consultants, and partners. Third parties are expected to comply with this policy and may be required to sign a Code of Conduct or Anti-Bribery Compliance Statement.

## 8. Reporting and Whistleblowing

* Employees are encouraged and required to report any suspicion or knowledge of bribery, corruption, or other unethical behavior immediately.
* Reports can be made to the HR Department and Legal Desk.
* All reports will be treated confidentially and investigated promptly.
* No employee will face retaliation or adverse action for reporting concerns in good faith.

## 9. Disciplinary Action

* Any employee found guilty of violating this policy will face serious disciplinary action, up to and including termination of employment.
* Contractors, vendors, or third-party associates in breach of this policy may have their contracts terminated immediately.
* Legal proceedings, fines, and criminal charges may also be pursued, as applicable under Indian or international law.

## 10. Monitoring and Compliance

* The HR and Compliance teams will periodically review policy effectiveness, monitor compliance, and update procedures as necessary.
* Regular audits and spot checks may be conducted to ensure adherence to the policy and legal standards.

## 11. Legal Compliance

This policy is designed in accordance with the Indian Prevention of Corruption Act, 1988, the U.K. Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), and other applicable international anti-bribery laws.

## 12. Policy Acknowledgment

All employees and third-party stakeholders must read, understand, and acknowledge this policy. Violations of this policy may expose individuals and the company to severe reputational and legal consequences.