

27. Gifts, Entertainment & Anti-Bribery Policy

Purpose

This policy ensures that all employees of Qubify Technologies Pvt. Ltd. maintain the highest standards of integrity and avoid situations that could create a conflict of interest or give rise to allegations of bribery, corruption, or undue influence.

Scope

This policy applies to: - All employees, contractors, interns, and consultants of Qubify. - All interactions with clients, vendors, partners, government officials, and any external stakeholders.

General Principles

- Employees must act with honesty, fairness, and transparency in all business dealings. - Qubify operates under a zero-tolerance approach toward bribery, corruption, or illegal inducements. - No gift, entertainment, or hospitality should influence — or appear to influence — business decisions.

Gifts & Hospitality

Permitted Gifts & Hospitality: - Non-cash gifts of nominal value (e.g., company-branded merchandise, small souvenirs) given openly and transparently. - Reasonable meals, refreshments, or hospitality in the normal course of business. - Culturally appropriate gifts during festivals or formal events, with prior approval from management. Prohibited Gifts & Hospitality: - Any cash or cash equivalents (e.g., gift cards, vouchers). - Excessive or lavish hospitality that could appear to create an obligation. - Gifts, entertainment, or hospitality provided during active contract negotiations or tenders. - Anything offered with the intent to secure favorable treatment or influence decision-making.

Anti-Bribery & Corruption Rules

- Employees must never offer, give, request, or accept bribes in any form. - Any attempt to influence a business decision through improper means will result in immediate termination and legal action. - Compliance with the Prevention of Corruption Act, 1988 and other applicable anti-bribery laws is mandatory.

Reporting & Disclosure

- All gifts or hospitality above ₹2,000 in value must be reported to the HR department and approved by senior management. - Any suspected bribery, corruption, or unethical conduct must be reported immediately to HR or through the company's grievance redressal mechanism.

Disciplinary Actions

Violations of this policy may result in: - Written warnings or suspension. - Termination of employment without notice. - Legal action, including criminal prosecution, if applicable.