

Anti-Bribery and Corruption Policy

Version 1.1



Document History

Document Version	Date	Author	Reviewed by	Approved by	Remarks
0.1	24 th March 2017	Consultant			Draft
1.0	27 th March 2017		Director	Director	Reviewed
1.0	28 th Aug 2018		Parvati	Ravisha TC	Reviewed but no changes done
1.0	22 nd June 2019		Parvati	Ravisha TC	Reviewed but no changes done
1.0	03 rd June 2020		Prathibha SH	Ravisha TC	Reviewed but no changes done
1.1	8 th June 2021		Prathibha SH	Ravisha TC	Added section 11

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1. INTRODUCTION

Whoever we may deal with, and wherever we may operate, we are committed to doing so lawfully, ethically and with integrity. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated. We must not, and we must ensure that any third party acting on our behalf does not, act corruptly in our dealings with any other person.

This anti-bribery and corruption policy sets out PearlArc Systems Pvt Ltd policies to prevent acts of bribery and corruption. These policies and procedures have been designed to comply with legislation governing bribery and corruption on a global basis.

This policy provides guidance on the standards of behaviour to which we must all adhere and most of these reflect the common sense and good business practices that we all work to in any event. This policy is designed to help you to identify when something is prohibited so that bribery and corruption is avoided, and provide you with help and guidance if you are unsure about whether there is a problem and you need further advice.

This policy is applicable to all employees.

2. OBJECTIVE

PearlArc Systems Private Limited ("PearlArc" or the "Company") is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is PearlArc's policy 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.

3. SCOPE AND APPLICABILITY

This Anti-bribery and Anti-Corruption Policy (this "Policy") applies to all individuals worldwide working for all affiliates and subsidiaries of PearlArc at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary), consultants, interns, or any other person associated with PearlArc (collectively referred to as "You" or "you" in this Policy).

In this Policy, "Third Party(ies)" means any individual or organization, who / which come into contact with PearlArc or transact with PearlArc and also includes actual and potential clients, suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures and government & public bodies (including their advisers, representatives and officials, politicians and political parties).

4. ABBREVIATION

IMSO –Integrated Management System Officer

5. WHO THIS POLICY APPLIES TO

The fundamental standards of integrity under which we operate do not vary depending on where we work or who we are dealing with. This policy applies to all PearlArc Systems Pvt Ltd officers,

employees (full and part time) and temporary workers (such as consultants or contractors) (together referred to as “employees” in this document) across the group no matter where they are located or what they do. It is the responsibility of each of us to ensure that we comply with these standards in our daily working lives. This policy sets out a single standard that all employees must comply with, regardless of whether local law or practices might permit something to the contrary.

Part of PearlArc Systems Pvt Ltd commitment to prevent bribery and corruption is to ensure that the people acting on our behalf also do so in compliance with effective anti-bribery and corruption policies. Accordingly, where we engage third parties such as agents, distributors or joint venture partners, we have obligations to complete sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly, and to periodically monitor their performance to ensure ongoing compliance. In short, if we can’t do it, neither can they.

6. HOW TO RAISE A CONCERN

Every person, to whom this policy applies too, 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 and/or the Management.

7. WHAT TO DO IF YOU ARE A VICTIM OF BRIBERY AND CORRUPTION?

It is his / her responsibility to inform / report it to their respective Managers and the Management as soon as possible if you are offered a bribe by a third party, you are asked to make one, suspect that this may happen in the future or believe that you are a victim of another form of corruption or other unlawful activity. You must refuse to accept or make the payment from or to a third party, explain our policy against accepting or making such payment and make it clear that the refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your Manager.

8. PROTECTION

Those who refuse to accept or offer a bribe or those who raise concerns or report another’s wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in bribery or corrupt activities or because of reporting their suspicion in good faith that an actual or potential bribery or other corruption offence has taken place or may take place in the future. If any employee believes that he / she has suffered any such treatment, he / she should inform their Manager/Management immediately.

9. WHO IS RESPONSIBLE FOR THE POLICY?

The Chief Executive Officer has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it.

Managers at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on how to implement and adhere to it and also monitor compliance of it.

The Compliance/ HR team is responsible for this Policy and for monitoring its use and effectiveness (and dealing with any queries on its interpretation).

Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrong-doing.

10. WAIVER AND AMENDMENT OF THE POLICY

We are committed to continuously reviewing and updating our policies and procedures based on the learning. This is so even when PearlArc enters new market/ sector/ country which may pose a risk under this Policy. The Management/ HR will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Therefore, this document is subject to modification. Any amendment or waiver of any provision of this Policy must be approved in writing by the Management. The Policy will be reviewed and audited from time to time which requires cooperation from all concerned.

11. REFERENCE

- ISO 27001: A.8.3.3 Physical Media Transfer