



## **Space Inventive Private Limited**

### **ANTI-BRIBERY & ANTI-CORRUPTION POLICY**

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#### **SPACE INVENTIVE PRIVATE LIMITED**

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## Anti Bribery & Corruption Policy

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## 1. Introduction

This anti-bribery policy exists to set out the responsibilities of Space Inventive Pvt Ltd and those who work for us regarding observing and upholding our zero-tolerance position on bribery and corruption.

It also exists to act as a source of information and guidance for those working for Space Inventive Pvt Ltd. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

## 2. Scope

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees, consultants, contractors, trainees, interns, or any other person associated with us.

## 3. Policy Details

### 3.1 Definition of Bribery

1. Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage to induce or influence an action or decision.
2. A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory, or personal advantage.
3. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.
4. Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes to any degree. If they are uncertain about whether something is a bribe or a gift, or an act of hospitality, they must seek further advice from the company's compliance manager.

### 3.2 Zero Tolerance

We operate a zero-tolerance approach to bribery and corruption. Every employee and associated person are responsible for maintaining our reputation by conducting business without the promise, offer, authorization, or acceptance of a bribe in any form.

### 3.3 Gifts and Hospitality

Gift-giving and hospitality are common practices in the business world, meant to build goodwill and strong working relationships. Nevertheless, these should not be used to influence business decisions or government officials. All gifts and hospitality given or received must be reasonable, appropriate, modest, and bona fide corporate hospitality.

All gifts and hospitality must comply with applicable Indian laws, including the Prevention of Corruption Act, 1988

### 3.3 Facilitation Payments

1. Space Inventive Pvt Ltd recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each
2. As good practice, gifts given and received should always be disclosed to the compliance manager. Gifts from suppliers should always be disclosed
3. The intention behind a gift being given/ received should always be considered. If there is any uncertainty, the advice of the compliance manager should be sought
4. Facilitation payments are strictly prohibited under this policy.

### 3.4 Record-Keeping

Accurate records of all hospitality, gifts, donations, and expenses claimed, related to the business dealings of Space Inventive Pvt Ltd, must be maintained. All financial accounts, invoices, and other records must accurately reflect the nature and purpose of transactions.

### 3.5 Due Diligence

We are committed to conducting due diligence on all potential new hires, business partners, and third-party connections to ensure alignment with our values and this policy. Due diligence processes are in place to uncover any risks of bribery and corruption.

### 3.6 Training and communication

Training on this policy forms part of the induction process for all individuals who work for us, and regular policy training will be provided as necessary. Our zero-

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tolerance approach to bribery and corruption must be communicated to all suppliers, contractors, business partners, and any other parties involved in our business activities.

### 3.7 Monitoring and reviewing

1. SI's compliance manager is responsible for monitoring the effectiveness of this policy and will review its implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.
2. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.
3. Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to the compliance manager.
4. This policy does not form part of an employee's contract of employment, and SI may amend it at any time so to improve its effectiveness in combating bribery and corruption.

### 3.8 Enforcement

Non-compliance with this policy will not be tolerated and can result in disciplinary action, up to and including termination of employment. Where illegal activity is suspected, it will also be reported to the appropriate authorities.

Any suspected bribery may also be reported to law enforcement agencies in accordance with Indian anti-corruption legislation.

### 3.9 Contact Information

For any queries or to report a concern related to this policy,  
kindly contact:

Email: [Security@spaceinventive.com](mailto:Security@spaceinventive.com)

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