

# Anti-Money Laundering & Anti-Bribery And Anti-Corruption Policy (AML & ABAC Policy)

Domotix Solutions Private Limited requires its employees and workers to act honestly and with integrity at all times and to safeguard the resources for which they are responsible. In this context Company is committed to ensuring that opportunities for corruption and bribery are eradicated. These principles are based on the commitment to fundamental values of integrity, transparency, and accountability. Domotix aims to create and maintain a trust-based and inclusive internal culture in which there is zero tolerance for bribery and corruption including facilitation payments. This Policy sets out for the control of actual and suspected corruption and bribery within Domotix, and the processes to be followed in the event of actual or suspected instances of corruption or bribery being discovered.

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Domotix will re-examine its links with any third parties it has reasonable grounds to suspect are involved in bribery or corruption. It will not hesitate to take appropriate legal and/or disciplinary action against employees and third parties who breach the Company's anti-bribery and anti-corruption policy.

## 1. Background

- Bribery and corruption are criminal offences, punishable for individuals by up-to 7 years imprisonment and if company is found to take part in corruption, Company would face an unlimited fine and face damage to its reputation. Therefore, Domotix takes legal responsibility very seriously.
- The company will uphold all laws relevant to countering to bribery and corruption in all the Jurisdiction in which it operates. It remains bound by local, national and international laws.
- Money laundering is punishable by rigorous imprisonment of at least three years, which can extend up to seven years under the Prevention of Money Laundering Act (PMLA) of 2002. In addition to imprisonment, offenders face unlimited fines proportional to the severity of the crime.

## 2. What is Bribery, Corruption & Money Laundering?

- Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit. It can be direct or indirect through Third Parties or Agent.
- Bribery includes offering, promising, giving, accepting, or seeking a bribe.
- Corruption is the abuse of entrusted power or position for personal gain. Corruption often results from patronage and is associated with bribery.

- Money laundering involves disguising financial assets so they can be used without detection of the illegal activity that produced them. Through money laundering, the criminal transforms the monetary proceeds derived from criminal activity into funds with an apparently legal source. This AML & ABAC Policy ('Policy') sets out essential steps Employees (as defined herein below) must take to avoid being implicated for money laundering and to prevent involvement in any activity relating to bribery, facilitation payments, or corruption, even where the involvement may be un-intentional.

### 3. Scope and Applicability

- This Policy is applicable to all the employees working at all levels and grades including senior managers, officers, other employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, interns, seconded staff, casual workers and agency staff, agents, or any other person associated with the Company and such other persons, including those acting on behalf of the Company (collectively for the limited purpose of this Policy referred as 'Employees'). This Policy governs all operations of Domotix, whether domestic or international.
- Regardless of the territory or location of your work, undertaken on behalf of Domotix, this Policy and all applicable anti-bribery and anti-money laundering laws apply to you. Most countries have anti-bribery and anti-money laundering laws that prohibit bribing a governmental official or official performing public duty, such as the Prevention of Corruption Act, 1988 and the Prevention of Money Laundering Act, 2002 in India, US Foreign Corrupt Practices Act and the UK Bribery Act.
- In the event this Policy is stricter than the laws that are applicable, including both applicable local laws and those laws with extra-territorial application, this Policy will prevail. However, if any part of this Policy conflicts with local laws in any location, the local law of the appropriate jurisdiction will prevail. The same principle will apply in case this Policy conflicts with sectoral laws, as may be applicable.
- Breach of applicable anti – corruption laws may also result in criminal, civil and regulatory penalties for Domotix and / or its employees including fine and imprisonment, and severe reputational damage for company. Compliance with the policy is therefore of fundamental importance.
- This policy set out minimum standards to help company employees prevent, detect, and report public corruption and commercial bribery.

### 4. Responsibility for the Policy

- The board of directors has overall responsibility for ensuring this policy shall complies with all legal and ethical obligations, and that all those under control of company shall comply with it.
- Line management have primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering bribery, Money laundering and corruption.

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## Domotix Solutions Private Limited

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Also Serves at: Mumbai, Vadodara, Bengaluru, Kolkata, Hyderabad

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- Management at all levels are responsible for ensuring that they exemplify the principles outlined in this policy and ensure that their team understand and comply with this policy.

## 5. Compliance with the Policy

- All Employees have the responsibility to read, understand and comply with this policy. They should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.
- The prevention, detection and reporting of any form of bribery and corruption are the responsibility of all employees. Employees must notify Company's Whistle Blower Officer as soon as possible, if they offered bribe, are asked to make one, suspect that it may happen in the future, or believe that they are a victim of another form of lawful activity or are aware of any bribe paid or received by any colleague or third party.
  - i) Give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received in return, or to reward any business received;
  - ii) Accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business advantage for them or anyone else;
  - iii) Give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
  - iv) Accept a gift or hospitality from a third party if employees know or suspect that it is offered or provided with an expectation that a business advantage will be provided by Company in returned;
  - v) Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
  - vi) Engage in any activity that might lead to a breach of this policy.
- If Employees believe or suspect that a conflict with this policy has occurred, or may occur in the future, then he must notify to his line manager or report it in accordance with Company Whistleblowing Policy as soon as possible.
- Employees are encouraged to raise concerns about any issue or suspicion of bribery or corruption in any parts of Company's business or supply chains of any supplier tier at the earliest possible stage.
- If Employee believe or suspect a breach of this policy has occurred or that it may occurs, he must notify to his line manager or report it in accordance with Company's

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- If employees are unsure about whether a particular act within any tier of supply chains constitutes bribery or corruption, raise it with line manager or report it in accordance with company's compliance email.
6. Gifts and Hospitality
- This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining image or reputation, or marketing Domotix's products and services.
  - A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
  - Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in Company name, not any employee name.
  - Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.
7. Record Keeping
- Any gifts offered (whether accepted or not) should be notified to the Line Management.
  - All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.
  - The Company will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to, and receiving payments from, third parties.
  - Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
  - Employees must ensure that all expense claims relating to hospitality, gifts or expenses incurred for third parties are submitted in accordance with the Company's applicable policy and specifically record the reason for such expenditure. Employees shall further ensure that all expense claims shall comply with the terms and conditions of this policy.
8. Protection from Retaliation
- Domotix aim to encourage openness and commitment to ensuring no one suffers any detrimental treatment/retaliation for refusing to take part in bribery or corruption, or report genuine concern in good faith under this policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.
  - Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If Employee believe that he has suffered any such treatment, then he should inform line manager immediately.
9. Breach of this Policy

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- Any employee who breaches this policy will face disciplinary action, which may result in any of the following –
  - I. Formal Apology
  - II. Counselling
  - III. Written Warning and a copy of it maintained in the employee's file
  - IV. Change of work assignment or Transfer
  - V. Suspension or termination of services of the employee found guilty of the offence.

#### 10. Communication and Awareness of this Policy

- Domotix's Zero Tolerance approach to Bribery and Corruption in business and supply chains must be communicated to all suppliers, contractors , and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### 11. Reporting Mechanism.

- Every Person, to whom this policy applies, is encouraged to raise their concerns about any bribery issue or suspicious of malpractice at the earliest stage.
- Once an employee's disclosure or concern has been submitted, it will be jointly reviewed by the Compliance Officer.
- The Audit Committee shall conduct such investigations in a timely manner and shall submit a written report containing the findings and recommendations to the Management as soon as practically possible.
- The Compliance Team and Management will jointly decide the action to be taken on the recommendations.



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### **ANNEXURE- I: Transactions Requiring Higher Scrutiny**

The Employees should be careful about the following transactions or situations which, when appearing together or individually, should raise a 'red flag':

1. A contract requires the use of a third-party consultant where the third party's principal or owner is a government official;
2. The business lacks qualifications or resources i.e., the potential business partner does not appear capable of performing the services being offered. Sham service contracts, under which corrupt payments are disguised using a consulting agreement or other arrangement are typical modalities for indulging in bribery or corrupt activities.;
3. Any potential partner who provides guarantees of success or claims to have the ability to obtain licenses or other government approval without providing a description of a legitimate manner by which those goals will be accomplished;
4. Transactions involving unusual payment patterns or financial arrangements or where consideration is disproportionately higher in relation to goods or services sought to be obtained or given. Accordingly, a request to pay unusually high commissions is a warning sign of possible corruption. A request to deposit commissions in multiple bank accounts, perhaps in offshore banks, also justifies additional scrutiny;
5. A potential counterparty who refuses to accept an anti-bribery and anti-corruption or anti-money laundering clause in the proposed contract;
6. Based on pre-acquisition / counterparty due diligence, it becomes apparent that the potential counterparty has a reputation for offering bribes or violating other laws or indulging in unusual, structured transactions.
7. Inflated pay-outs to, or questionable role in the project of potential counterparty or its affiliate;
8. A proposed counterparty resists or fails to provide details of parentage or has undisclosed principals, associates, or subcontractors with whom it splits fees.
9. Authorising or funding any transaction that is undisclosed or unrecorded in our books, records and accounts;
10. Omitting, falsifying, or disguising entries in any of our books and records or inducing or facilitating any third party to do so on their own.

## ANNEXURE-II: Employees Responsibilities

1. Each Employee shall ensure that he/she reads, understands, and complies with this Policy. They must avoid any activity that might lead to, or suggest, a breach of this Policy. The prevention, detection and reporting of any form of Bribery & Corruption are the responsibility of all Employees.
  
2. Employees shall:
  - Report, if they are offered a bribe, are asked to give one, suspect that this may happen in future, or believe that they are a victim of any other form of unlawful activity or are aware of any bribe paid or received by any colleague or third party;
  - Accurately record payments or any other type of compensation made to a third party in Company's corporate books, records, and accounts;
  - Regularly monitor and/ or review suppliers, customers, and other third-party service providers to identify business activity or governance that could indicate money laundering is taking place.
  - Employees shall not:
  - Deal with any undisclosed or unrecorded funds, such as 'off-book' amounts, for any purpose;
  - Make false, misleading, incomplete, inaccurate, or artificial entries in Domotix 's books and records or forge any documents or records of Domotix;
  - Use personal funds or third parties, including partners, to circumvent Domotix 's procedures and controls, or to accomplish what is otherwise prohibited by this Policy;
  - Employees should only deal with representatives that they believe are legitimate businesses and that have a reputation for integrity. Signs that a representative is unethical or could be paying a bribe should not be overlooked;
  - Conducting transactions transparently reduces the risk of bribery. Employees should make sure that contracts accurately reflect the economics of the transaction. If payment terms are confusing, clarifications should be sought;
  - Simply assume relevant third-party screening has already taken place: failure to check or update screenings periodically may put Group and its Employees at risk.

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