



Anti-Bribery and Corruption Policy

UNIFIED DATA-TECH SOLUTIONS LIMITED

(Formerly known as Unified Data-Tech solutions Private Limited)

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Anti-Bribery and Corruption Policy

1. Purpose

This Anti-Bribery and Corruption Policy ("Policy") sets out UNIFIED DATA-TECH SOLUTIONS LIMITED's commitment to conduct business with integrity, transparency, and zero tolerance towards bribery and corruption.

2. Scope

This Policy applies to all employees, directors, officers, contractors, consultants, agents, and any other third parties acting on behalf of the Company, whether based in India or overseas.

3. Policy Statement

Our Company strictly prohibits the offering, giving, solicitation, or receiving of any bribe—whether cash, gifts, hospitality, or other inducement—in order to obtain or retain business or any advantage in the conduct of business.

4. Definition of Bribery

Bribery involves offering, promising, giving, accepting, or soliciting something of value (e.g., money, gifts, entertainment, favors) to improperly influence the actions of an individual in a position of trust.

5. Gifts and Hospitality

- Modest and appropriate gifts and hospitality may be allowed only if:
- They are not cash or cash equivalents.
- They are not given with an expectation of return favor or business advantage.
- They are reported and recorded as per company procedures.
- Lavish or frequent gifts or hospitality are strictly prohibited.

6. Facilitation Payments and Kickbacks

- The Company prohibits facilitation payments, which are small payments made to expedite routine government actions.
- Kickbacks or any portion of contract payments being returned improperly are also forbidden.

7. Charitable Donations and Sponsorships

Donations must not be used as a subterfuge for bribery. All charitable donations must be:

- Legal and ethical.

- Made with appropriate approval.
- Transparent and recorded.

8. Third Parties and Due Diligence

Third parties (agents, consultants, joint ventures) must:

- Be subject to due diligence.
- Be made aware of this Policy.
- Agree to comply with anti-bribery policy.

9. Reporting Concerns

Employees must report any suspicion or knowledge of bribery or corruption to:

- [Designated Officer / Compliance Manager / HR]
- Retaliation against whistleblowers is strictly prohibited.

10. Disciplinary Action

Violation of this Policy is considered serious misconduct and may result in disciplinary action including termination and/or legal proceedings.

11. Training and Communication

- Anti-bribery training will be provided to employees.
- The Policy will be made available to all stakeholders.

12. Review of Policy

This Policy will be reviewed as and when necessary and updated as necessary to reflect changes in law, regulation, or company practice.

Amendment

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever.