

Anti-Bribery and Anti-Corruption Policy

Preamble

UFlex Limited (hereinafter referred to as 'UFlex', 'The Company') has zero tolerance towards any kind of bribery or corruption and is committed to ensuring adherence to highest ethical values. The Company strives to forge ethical business deals and strictly prohibits any kind of bribery or corrupt practices. The Company follows the highest standards of corporate governance and adheres to doing fair and open business. The Company recognizes and embraces the importance of integrity in all its business dealings.

Purpose

The purpose of the Policy is:

- To set out responsibilities that the Company shall comply laws and regulation against anti-bribery and corruption.
- To guide the Company to act ethically and professionally in all business dealings and relationships.

Scope

The Policy is applicable to all employees of UFlex at all levels and grades, including directors, senior managers, officers, other employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, volunteers, interns, sponsors, seconded staff, casual workers and agency staff, agents, or any other person / entity acting for and on behalf of the Company.

Definitions

'Bribe/ Bribery' refers to the offering, giving, soliciting, promising, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty.

"Corruption" refers to misuse of assigned power for personal benefits.

"Policy" means "The Anti-Bribery and Anti-Corruption Policy (ABAC)"

"Fee payment" means fixed amount charged for a specific service. Fees are applied in a variety of ways such as costs, charges, commissions, and penalties.

"Gifts and Hospitality" Gift is anything of value and would encompass any complimentary monetary or non-monetary benefit. It may include a tangible or an in-tangible item that are not available to the public. Hospitality refers to the considerate care of any individual, which may include refreshments, accommodation and entertainment at a restaurant, hotel, club, resort, convention, concert, sporting event or other venue such as Company offices, with or without the personal presence of the host.

Forms of Bribery

There can be incalculable forms of bribery or corrupt practices, but the following areas pose the greatest threat as identified by the company:

Fee Payments

The Company shall take requisite measures to ensure that any fee paid by the Company shall be associated rightfully with the activity being performed. The Company shall adhere to the Companies Act, 2013 for making any Related Party Transactions (RPT).

Offers of employment

The Company shall follow the general procedure of recruitment while recruiting any candidate related to the Company's senior personnel. The Company shall ensure that no special treatment is provided to such employees in the recruitment process and employment of such employees shall happen only based on education, experience, expertise and performance.

Charitable Contributions and sponsorships

The Company does not prohibit support to local charities and sponsorship to events as a part of Corporate Social Responsibility (CSR). Prior approval of appropriate authority shall be obligatory before making any contribution or charity. Any payment to a charity, domestic or foreign, shall be in accordance with the applicable rules and regulations prescribed by the law.

Gifts and Hospitality

Gifts can be seen as bribes, and they may be intended to create reciprocal obligations. Gifts and Hospitality can generate real or perceived conflict of interest. Employees shall be forbidden to accept any kind of gifts, donations, discounts, favors equivalent to USD 100 from an existing or potential client, competitor, supplier, or service provider.

Political Donations

Donations to political parties, political committees or candidates using the Company resources (including monetary and in-kind services) can be made, given that the process is transparent, duly approved and properly documented. Approval from appropriate authority must be taken prior to making any such advancement. This Policy does not restrict an employee to make any political donations/gifts in his/her private capacity.

Protection/ No retaliation

Retaliation means to hurt someone or do something harmful to someone because they have done or said something harmful to you. The Company ensures that no individual shall suffer any detrimental effect because of their refusal of participation in any corrupt activity, even if it results in loss of business for the Company. The Company has zero tolerance towards any kind of retaliation. Any kind of retaliation will be considered as gross misconduct.

Disciplinary action for non-compliance

Non-adherence to this Policy may lead to disciplinary action which may include one or more of the following:

- Formal apology
- Down-grade of designation

- Counselling
- Withholding of promotion
- Termination of service

Monitoring and Review

The Company reserves the right to regularly review and make any necessary modifications to this Policy. Our internal stakeholders shall review the policy as per requisite and any amendments to the same shall be approved by the Board of Directors.

Communication & Awareness

The Company does not condone giving or receiving bribes or corrupt payments. The Company provides orientation to new employees about Anti-corruption and Anti-bribery practices at the time of joining and also ensures it by including the same in company's code of conduct document duly signed & accepted by new employees.

Master List Ref	Release Date	Review Date	Next Review Date
Version	Process Owner	Reviewed by	Approved by