

Anti-Bribery & Anti-Corruption Policy

Policy Statement and Purpose

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Organization's business is conducted in a socially responsible manner.

The Company and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits which are intended to or perceived to obtain business or uncompetitive favours for the conduct of its business and shall participate in efforts to eliminate such forms of an 'illicit payment', bribery, fraud and corruption.

We uphold all laws relevant to countering bribery and corruption applicable to us in the conduct of our business across all the jurisdictions in which we operate including but not limited to Indian Prevention of Corruption Act, 1988 ("PCA")

Policy Objectives

- I. To initiate the steps to reduce the bribery and corruption risks to the business of the Organization by setting out clear guidelines.
- II. To encourage all employees to be vigilant and to act diligently in good faith.
- III. To monitor and investigate instances of alleged corruption.
- IV. To take firm and vigorous action against any individual(s) involved in corruption.
- V. To minimize the risk of involvement of all employees and Directors in corruption related activities
- VI. To form a common understanding for all stakeholders that MITCON prevents corruption in any form
- VII. To set responsibility for the employees of MITCON to know and comply with the principles and requirements of the Policy, the key rules of the applicable anti-corruption laws, as well as adequate procedures to prevent corruption

Scope

This policy applies to all individuals working at all levels and grades, including Directors, senior managers, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, business partners, and third-party representatives anywhere in the world, or any other person associated with us, wherever located who may be acting on behalf of MITCON.

Coverage

This policy covers:

- I. Bribes;
- II. Gifts and hospitality;
- III. Facilitation payments;
- IV. Political contributions;
- V. Charitable contributions.

Non-Compliance

Deviations or non-compliance with this policy, including attempts to circumvent the stated policy/process by bypassing or knowingly manipulating the process, system, or data may result in disciplinary actions, up to and including termination, as allowed by local laws
