

INTERLACE INDIA PVT LTD



ANTI BRIBERY & CORRUPTION POLICY



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An Anti-Bribery Policy is a set of guidelines, principles, and procedures established by an organization to prevent bribery and corrupt practices within the company.

It outlines the organization's commitment to ethical business conduct, compliance with anti-bribery laws, and the consequences for individuals who engage in bribery.

Such policies are essential for maintaining integrity, reputation, and legal compliance.

Here's a general framework for an Anti-Bribery Policy:

1. POLICY STATEMENT:

Interlace India Pvt Ltd is committed to conducting business with the highest standards of integrity, transparency, and accountability. We have a zero-tolerance approach to bribery and corruption in any form, whether direct or indirect. We follow a clear and concise statement of the organization's commitment to preventing bribery and corruption.

Bribery

Business corruption focuses on bribery:

An offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust in the conduct of the enterprise's business

CORRUPTION – A GLOBAL SECURITY THREAT

Cost of Corruption exceeds by far the damage caused by any other single crime.

The use of public office for private gain or in other words, use of official position, rank or status by an office bearer for his own benefit.

2. Scope of the Policy:

This Bribery and Corruption Policy applies to all employees, directors, officers, consultants, contractors, interns, and temporary staff of **Interlace India Pvt Ltd**, regardless of their role, level, or location. It also extends to third parties acting on behalf of the company, including agents, suppliers, vendors, joint venture partners, and other business associates.

The policy is applicable across all business activities and operations conducted by or on behalf of **Interlace India Pvt Ltd**, both domestically and internationally.

3. Legal Framework:

Interlace India Pvt Ltd is committed to complying with all applicable anti-bribery and anti-corruption laws and regulations in the countries where we operate. These laws are designed to prevent corrupt practices in both public and private sector dealings.

This policy is informed by the following key anti-bribery laws and regulations:

- ❖ The U.S. Foreign Corrupt Practices Act (FCPA)
- ❖ The UK Bribery Act 2010
- ❖ The Prevention of Corruption Act, 1988 (India)
- ❖ United Nations Convention Against Corruption (UNCAC)

Interlace is committed to upholding the highest legal and ethical standards as required under these laws.

4. Prohibited Conduct:

Bribery includes offering, giving, receiving, or soliciting anything of value to influence a business decision or secure an improper advantage. Prohibited conduct includes:

- ❖ Cash or cash equivalents (e.g., gift cards)
- ❖ Lavish gifts or entertainment
- ❖ Favour's or services
- ❖ Travel or accommodation unrelated to business purposes
- ❖ Donations or sponsorships intended to gain improper influence

Both giving and receiving bribes are strictly forbidden.

5. Reporting Mechanism:

INTERLACE is committed to maintaining the highest standards of integrity, and we strongly encourage employees, contractors, partners, and other stakeholders to report any actual or suspected incidents of bribery, corruption, or unethical conduct.

To facilitate this, we have established a confidential and secure reporting mechanism that allows individuals to raise concerns without fear of retaliation.

Reporting Channels:

Email: [whistleblower@interlaceindia.com]

Phone Hotline: [+91-9445399353] (Available [24/7])

Designated Compliance Officer: [Mr. Kalyanasundaram, HR Manager]

Non-Retaliation Policy:

Retaliation against any individual who reports a concern in good faith is strictly prohibited. Any act of intimidation, harassment, or adverse treatment of whistleblowers will result in disciplinary action, up to and including termination of employment.

We are committed to fostering a culture of openness, accountability, and transparency.

All reports will be treated seriously, investigated promptly, and handled with the utmost confidentiality.

6. Consequences:

Consequences of Violations: Interlace takes all violations of this Anti-Bribery and Corruption Policy seriously. Any employee, contractor, consultant, or third-party representative found to have engaged in bribery, corruption, or related misconduct will face strict disciplinary and legal consequences.

Violations of this policy may result in:

- ❖ Disciplinary actions up to and including termination of employment or contracts
- ❖ Legal prosecution, which may result in fines or imprisonment

Reputational damage to individuals and the organization

All individuals are expected to act responsibly and in full compliance with this policy and applicable laws. Ignorance or negligence will not be accepted as a defense for misconduct.

7. Due Diligence:

Before engaging third-party partners such as contractors, suppliers, or agents, Interlace will:

- ❖ Include anti-bribery clauses in contracts
- ❖ Monitor performance and compliance periodically

8. Trade Compliance and Sanctions Adherence

As part of our commitment to ethical business practices and global regulatory compliance, Interlace India Pvt Ltd strictly adheres to all applicable U.S. and international trade control laws, including:

- **The U.S. Export Administration Regulations (EAR)**

- The **International Traffic in Arms Regulations (ITAR)**
- Sanctions and embargoes administered by the **U.S. Office of Foreign Assets Control (OFAC)**
- Applicable trade laws in jurisdictions where the company operates

We do not engage in any transactions—directly or indirectly—with individuals, organizations, or countries subject to embargoes, sanctions, or trade restrictions. This includes, but is not limited to, entities or individuals listed on the **U.S. Government’s Denied Persons List, Specially Designated Nationals (SDN) List, Entity List, or Unverified List**, as well as any lists maintained by international regulatory bodies.

All employees, partners, agents, contractors, and subcontractors are required to:

- Ensure that no goods, software, technology, or services are exported, re-exported, or transferred to any restricted or embargoed party or location
- Verify the status of customers and partners against applicable restricted party screening lists before conducting business
- Comply with all licensing and reporting requirements associated with international transactions

Flow-down Responsibility:

These trade compliance obligations shall be flowed down to all third parties involved in the delivery of our services, including vendors, suppliers, resellers, consultants, and affiliates. Non-compliance with trade regulations will result in immediate investigation, reporting to authorities if applicable, and possible termination of the relationship.

9. Training and Awareness:

We provide regular training programs to employees and relevant stakeholders to ensure understanding of:

- ❖ Anti-bribery and corruption laws
- ❖ Company policies and expectations
- ❖ Reporting procedures

Training is mandatory for new employees and refreshed annually.

10. Gifts and Hospitality:

Employees must:

- ❖ Avoid giving or receiving gifts or hospitality that could influence decisions
- ❖ Seek prior approval for gifts or entertainment exceeding
- ❖ Record all such instances in the Gifts & Hospitality Register

Cash gifts and extravagant or frequent entertainment are strictly prohibited.

11. Record-Keeping:

Accurate records must be maintained for:

- ❖ Financial transactions
- ❖ Gifts, entertainment, and hospitality
- ❖ Due diligence procedures
- ❖ Donations and sponsorships

All records should be complete, clear, and accessible for review or audit.

12. Continuous Monitoring and Review:

We will regularly:

- ❖ Assess bribery risks and controls
- ❖ Conduct audits and compliance reviews
- ❖ Update the policy to reflect legal and business changes

Findings will be reported to senior management and necessary actions taken.

13. Leadership Commitment:

Senior management is responsible for promoting a culture of compliance and ethical conduct. They will:

- ❖ Model ethical behaviour
- ❖ Allocate resources for implementation
- ❖ Ensure accountability at all levels

Their active support reinforces the policy's importance and effectiveness.

14. Communication:

The policy will be communicated through:

- ❖ Employee handbooks and intranet portals
- ❖ On boarding and induction programs
- ❖ Regular emails, updates, and internal training
- ❖ Contractual terms with third parties

All employees and third parties are expected to read, understand, and comply with the policy.

15. Conclusion:

Interlace is dedicated to maintaining a transparent and ethical business environment. By complying with this Anti-Bribery and Corruption Policy, all personnel contribute to safeguarding our values and reputation.

Our organization adheres to all applicable local and international anti-bribery and anti-corruption laws and expects the same level of commitment from all employees, contractors, and third-party partners. We believe that ethical conduct is fundamental to maintaining trust, safeguarding our reputation, and achieving long-term success.

Through clear policies, ongoing training, transparent processes, and a strong culture of accountability, Interlace ensures that our operations are free from unethical practices and that every business decision is made lawfully and responsibly.