



# ANTI BRIBERY AND ANTI-CORRUPTION POLICY

## Objective:

Sasken conducts its business free from the influence of corruption and bribery. All stakeholders are expected to be aware of and follow all anti-corruption and anti-bribery laws applicable to the Company, its branches and subsidiaries. Sasians must be careful to avoid even the appearance of offering or accepting an improper payment, bribe or kickback. This Policy sets out the Sasken's commitment to conduct all business activities with integrity, transparency, and ethical standards. It aims to prevent bribery, corruption, and related misconduct in compliance with applicable laws including the Prevention of Corruption Act, 1988, the Companies Act, 2013, the UK Bribery Act, 2010, the U.S. Foreign Corrupt Practices Act (FCPA) and other applicable jurisdictional laws.

## Scope:

This Policy is applicable to all stakeholders of Sasken Technologies and its subsidiaries across the globe.

### 1. Policy Statements:

- Sasken follows a zero-tolerance approach towards bribery and corruption. No stakeholder shall offer, promise, give, solicit, or accept any bribe or improper advantage, either directly or indirectly, for business or personal gain.
- Sasken has implemented a whistleblower mechanism that enable stakeholders to report concerns related to unethical conduct, suspected fraud, or violations of the Code of Conduct.
- We also engage our vendors and suppliers through defined process to ensure alignment with our anti-corruption standards and to mitigate third-party risk across our value chain.

### 2. Anti-Competitive Practices:

- Sasken is committed to upholding the principles of fair competition and complying with all applicable antitrust and competition laws. We strictly prohibit any form of anti-competitive behavior, including collusion, price-fixing, bid-rigging, market allocation, or abuse of market dominance.
- To mitigate competition-related risks, Sasken conducts regular risk assessments and periodic audits. These reviews help ensure the continued effectiveness of our internal controls and alignment with regulatory requirements.
- We provide clear, role-specific guidance to employees on lawful interactions with competitors, in accordance with the Sasken Code of Conduct. Mandatory training sessions and accessible reference materials reinforce these standards and promote ethical business conduct throughout the Organization.
- By embedding competition compliance into our corporate culture, Sasken promotes transparency, market integrity, and long-term sustainable business practices.

### 3. Fraud

- Sasken maintains a zero-tolerance approach toward fraud and is committed to conducting all business activities with integrity, transparency, and accountability. We actively work to prevent, detect, and respond to fraudulent practices that may result in illegal or unethical advantage, including but not limited to misrepresentation, deception, forgery, or misuse of company resources.
- Fraudulent activities are strictly prohibited and are addressed in detail in the **Sasken Code of Conduct** and the **Disciplinary Policy**. Any suspected fraud will be thoroughly investigated, and appropriate disciplinary action—including legal recourse—will be taken in accordance with company procedures and applicable laws.

- Sasken promotes an ethical workplace culture by ensuring that employees are regularly trained on fraud prevention and are encouraged to report concerns at [discipline@sasken.com](mailto:discipline@sasken.com).
- By embedding anti-fraud principles into our governance framework, Sasken upholds ethical business practices and protects the interests of its stakeholders.

#### 4. Money Laundering

- Sasken is committed to preventing money laundering and the concealment of the origin, ownership, or destination of funds obtained through illegal or unethical means. We strictly prohibit disguising such funds through legitimate business activities to make them appear lawful.
- This commitment is detailed in the **Sasken Code of Conduct** and the **Disciplinary Policy**, which outline the standards and procedures for detecting, reporting, and addressing any suspected money laundering activities.
- Violations of these policies will be met with strict disciplinary action in accordance with applicable laws and company procedures, reinforcing our dedication to ethical business conduct and regulatory compliance.

#### 5. Conflict of Interest

- Sasken is committed to identifying, disclosing, and preventing any actual or potential conflicts of interest that may arise between an individual's personal interests and their professional responsibilities. Such situations can compromise impartiality, decision-making, or the integrity of the company.
- A Sasian must never use his/her association with Sasken for personal gain, and must avoid activities or associations that conflict with, appear to conflict with, or are likely to, over a period, conflict with his/her exercise of independent judgment of Sasken's best interests. It is impossible to identify in this Code all conflicting relationships, but the Sasian should carefully consider whether the following situations make it difficult for the Sasian to objectively and effectively perform the Sasians job: investment decisions, supplemental engagements for gain, accepting gifts from customers or suppliers, and similar activities of persons close to the Sasian. In the event of circumstances that lead to a conflict of interest or a possible conflict of interest the Sasian must notify the Compliance Officer immediately upon becoming aware of such circumstances.
- The Sasian must be prepared to take such remedial actions as may be required by the Compliance Officer. In the event that a Sasian has breached the policy on conflict of interest, the CEO shall refer the matter to the Board of Directors. Thereupon the Board will deliberate the matter in the light of the principles in the policy and keeping in mind the best interests of the Company. The Board shall thereafter take such action, as may be deemed fit and proper in the circumstances of the case.
- By proactively addressing conflicts of interest, Sasken upholds ethical standards, fosters trust, and maintains sound corporate governance.

#### 6. Violations and disciplinary actions

- Sasken is committed to enforcing this Policy and all related policies consistently and fairly. Any stakeholder found to have violated these policies will be subject to appropriate disciplinary measures, which may include warnings, corrective and legal actions, or termination of employment or contracts.
- All enforcement actions will be conducted in accordance with applicable local laws and regulations in the respective countries where we operate.





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- All Sasians must • Refrain from engaging in any form of bribery or corruption. • Report any suspected or actual breaches of the Code at [discipline@sasken.com](mailto:discipline@sasken.com). • Cooperate with any investigation related to suspected or actual violations of the Code.

Stakeholders are expected to adhere to this Policy and promptly report any concerns or violations through the established grievance and reporting mechanisms outlined above, nurturing a culture of accountability and continuous improvement.

**Approved By:**

This Policy has been reviewed and approved by the Board of Directors at their meeting held on 8<sup>th</sup> May 2026.

