

ANTI-BRIBERY AND SANCTIONS COMPLIANCE POLICY



Anti-Bribery and Sanctions Compliance Policy

1. Purpose of This Policy

This policy shows the organisation's strong commitment to honest and ethical business practices. It is meant to prevent bribery, corruption, and any dealings with restricted or blacklisted parties. All employees and representatives are expected to follow this policy at all times, in India and abroad.

2. Who This Policy Applies To

This policy applies to:

- All employees, including managers and directors;
- Consultants, contractors, vendors, and other third parties working with or representing the company;
- All group companies, branches, and joint ventures.

3. Bribery and Corruption – Company's Stance

3.1 Strict Prohibition

The Company does not allow any form of bribery. No one should give or take money, gifts, favours, or benefits to influence decisions or get unfair advantages—whether dealing with government officials or private individuals.

3.2 What Is Not Allowed

The following are strictly not allowed:

- Offering or accepting cash or gifts to get work done faster or to secure a contract;
- Using agents or middlemen to make illegal payments on our behalf;
- Giving expensive hospitality, travel, or entertainment to influence a decision;
- Making small payments (often called “speed money” or “facilitation fees”) to get approvals or clearances.

Shivtek Spechemi Industries Ltd

(Formerly known as Shshivtek Industries Private Limited)

CIN No. U24100DL2009PLC188730

• **Corp Office:** 1419, DLF Corporate Green Tower 1, Sector 74 A, Southern Peripheral Road (SPR), Gurugram, Haryana-122004 (India) Phone: +91-124-6904448

• **Regd Office:** Khasra No. 169, Ground Floor, Back Side, Alipur, Delhi- 110036

• **info@shivtekspechemi.com, sales@shivtekspechemi.com** • **www.shivtekspechemi.com**



3.3 Reasonable and Transparent Gifts

We understand that in some cases, exchanging gifts or hosting meals may be part of business culture. However, it must follow these rules:

- It should be of modest value;
- It must be legal and culturally acceptable;
- It must not be frequent or done secretly;
- It should be approved and recorded properly.

3.4 Dealing with Third Parties

Before we start working with any agent, consultant, or partner, proper checks must be done to make sure they follow our standards. This includes:

- Verifying their background and reputation;
- Understanding their role and responsibilities;
- Signing contracts with clear compliance terms.

3.5 Proper Documentation

All financial dealings must be recorded correctly. No one should create fake bills or hide payments. Internal approval must be taken before spending company money, and records must be kept for future reference.

4. Sanctions and Restricted Dealings

4.1 Avoiding Dealings with Banned Entities

We will not deal with any individual, company, or country that is under any form of official restrictions, such as blacklists or trade bans. It is our duty to ensure that no part of our business helps such persons, directly or indirectly.

4.2 Screening and Checks

- All new clients, vendors, and business partners must be checked against updated lists of restricted or banned parties;
- Ongoing monitoring is needed for high-risk relationships;
- Any doubts or potential matches must be reported to the Compliance team before proceeding.

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4.3 Export and Trade Controls

Any goods, services, or data that are being sent outside India must be cleared properly. If any export is sensitive or restricted, it must be approved by the Compliance team before going ahead.

5. Reporting Violations

5.1 Raise Concerns Freely

If you see or suspect any wrongdoing, or if you feel someone is breaking this policy, you must report it to hr@shivagroup.com or you can talk to the Directors directly. We also provide ways to report anonymously.

5.2 No Retaliation

The company will never allow retaliation or punishment against anyone who reports a concern honestly and in good faith—even if the issue turns out to be a misunderstanding.

6. Training and Awareness

- Everyone in the company must attend training on ethics, bribery prevention, and compliance;
- Special training will be given to people in high-risk roles;
- Attendance and completion of training will be recorded.

7. Monitoring and Internal Checks

This policy will be regularly reviewed through audits and compliance checks. Any gaps found will be fixed immediately through training or process improvement.

8. What Happens if the Policy is Broken

Breaking this policy can lead to serious consequences:

- Disciplinary action, including removal from service;
- Cancellation of contracts for vendors or third parties;
- Legal action or reporting to authorities, if required.

9. Policy Ownership and Updates

The Board of Directors of the Company are responsible for implementing and maintaining this policy.

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