

Sansera Anti-Bribery Policy

According to the Act "A Bribe is a financial or other advantage intended to induce or reward the Improper performance of a person's function or activity, where benefit could create a conflict Between personal interests and business interests".

M/S. Sansera Engineering limited. is committed to the highest standards of personal and professional ethical behaviours and practice. The Company does not tolerate any bribery/corruption committed by employees or its contractors or partners and will take consistent and swift action (including dismissal and legal action), against those persons committing bribery. Company considers integrity and belief of an employee as a basic traits and code of conduct for each and every employee of the company.

This policy should be read in conjunction with the Company Code of Conduct for all employees and the Anti-Fraud, Anti-Bribery & Anti-Corruption Policy Collectively, This particular policy will set-out the necessary bribery/corruption and fraud prevention, detection and response for processes and controls, by which the Company ensures an appropriate bribery and fraud prevention strategy is in place.

Policy objectives:

1. Assist in the prevention of bribery/corruption.
2. Ensure that the Company has the adequate procedures in place to prevent any bribery/corruption.
3. Explain the procedures to be followed by the Company management, staff & employees whenever there is evidence or a suspicion of an incident of bribery/corruption having been committed.
4. Describe the reporting and investigation procedures in this situation.

Definition anti Bribery:

Anti-Corruption:

- Sansera will ensure to comply with the anti-corruption laws, for example US Foreign Corrupt Practices Act and the U.K. Bribery Act etc. that apply to its operations and those of the Countries in which they do business.
- Sansera will ensure to have a zero-tolerance policy for all forms of bribery, corruption, extortion and embezzlement.
- Sansera will ensure to prohibit promising, offering, authorizing, giving, or accepting something of value, either directly or indirectly through a third party, in order to Obtain or retain business, direct business to any person, or otherwise gain an improper advantage.
- Sansera will have zero tolerance towards small bribes (commonly known as 'facilitation payments') with no exemptions.

PRINCIPLES OF BRIBERY PREVENTION

1. Risk Assessment:

The risk of bribery is an integral part of general risk management within the Company. Risk evaluation within the Company is carried out using a business process approach. This entails the identification of critical business processes, identification of risk associated with each process and the development of effective, efficient and transparent controls to reduce exposure to identified risks.

As such, risk management activities include the estimation of the opportunity for likelihood and impact of the occurrence of bribery. Heads of Services are required to report annually to Internal Audit confirming their Anti-Fraud & Anti-Corruption Assurance Statement. The risks of Bribery will be considered as part of the company's code of conduct and its rule and regulations.

2. Top level commitment

This concerns the responsibility of senior manager to take the lead in establishing a culture across the Company in which bribery is unacceptable. The theme is making the message clear, unambiguous and regularly made to all staff and business partners.

The Company believes that it has a responsibility to take an active stand against bribery. This extends to all of the Company's dealings, transactions and provision of services. Accordingly, the Company has adopted a policy of zero

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tolerance towards bribery, as reflected in this Policy. The Senior Management Team is responsible for providing leadership, resources and active support for implementing this policy and are responsible for ensuring that this policy is applied within all service areas.

This policy is supported by the Company's governance framework and risk management processes which are reviewed by the Senior Management Team. The oversight of internal control, internal audit and risk management processes are the means by which the senior management assures itself of the effective implementation and monitoring of this policy.

3. Accessible Policies and Procedures

This concerns communicating and applying them to everyone the company employee and to the business partners under the effective control, covering all relevant risks such as political and charitable contributions, gifts and hospitality, promotional expenses, and responding to demands for facilitation payments or agreements or when an allegation of bribery comes to light.

The Code of Conduct for all employees prescribes in detail the Company's policies on:

- a) The persons to whom the Code applies.
- b) The procedures for approval, recording and accounting of payments, gifts and Hospitality;
- c) The sanctions and penalties that may apply to individuals in the event of breach of Rules, including disciplinary sanctions that may be imposed.

The Anti-Fraud Policy sets out how the Company will deal with:

- a) Culture and reporting.
- b) Prevention and detection.
- c) Detection and investigation.
- d) Training.

4. Effective implementation:

This is about going beyond 'paper compliance' to embedding anti-bribery in Company's internal controls, recruitment and remuneration policies, operations, communications and training on practical business issues.

5. Training:

The training programme is devised to provide specific training to managers and employees. This is provided on a continuing basis and appropriately to the needs and risks relating to their work. Heads of Service are responsible for identifying those employees who should undergo training and the type and level of training that is appropriate. Training is delivered by a variety of means including web-based tools, electronic means, in groups or in one to one sessions, as appropriate.

6. Communication:

Communications of this policy is important as a deterrent to those who may be tempted to engage in Bribery. The Company will review the communications strategy to reinforce the desired effect.

(i) Internal:

The key objectives of internal communications are to ensure that all employees, officers and concerned persons are aware of this policy, Code of Conduct, Anti-Fraud, Anti-Bribery & Anti-Corruption Policy and the Whistle blowing Policy and its importance in order to counter Bribery and Fraud.

(ii) External: External communications are used to inform the company's policies and practices to the concerned.

Information/ Resources and Contact Details

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DETECTION

1. Identifying Bribery or Fraud:

The responsibility for considering this issue, and the implementation of an appropriate strategy to effectively deal with bribery risks, lies with each Head of departments. The initial responsibility for identifying risks of and instances of suspected bribery lies with each department. It is the responsibility of all employees to be vigilant of the risk of bribery and to report any suspicion or incident of bribery, or any concerns about any risks in this regard, through the facilities and processes provided by the Company as soon as any issue arises.

2. Discovery through Inspection and Monitoring:

The process of inspection is described below. The Company and the department Heads will have the vigilant to identify the risk of bribery. In the event of bribery being discovered during the inspection and monitoring, the matter is reported to the concerned department head who will decide if the matter warrants a detailed investigation.

3. Reporting Bribery or Fraud:

Employees should raise concerns and violations as early as possible. If an employee or other person feels that, due to reasons of confidentiality, a report of a suspicion or incident of bribery or cannot be given to the concerned head of department then the employee should report the matter through the Whistle blowing Policy. In all other cases, the employee should report any suspicion or incident of bribery to the concerned head of the department.

4. Corrective actions:

(i) **Disclosure of the results and root cause remedies:**

A report will be prepared for each investigation performed and will include identification of root causes of the incident/violation (control gaps/deficiencies, collusion, systems penetration, or sabotage etc.). Following thorough consideration and analysis of these findings, remedial actions will be taken to address the identified deficiencies/gaps including but not limited to amending existing or implementing new procedures and controls, improving existing or implementing new systems and increasing assurance activities. The results of all incidents investigated are reported to the relevant head of the department.

(ii) **Communication to employees:**

Appropriately, limited information in relation to incidents of bribery committed and action taken may be communicated to employees, for example, where this is necessary to emphasise that the Company will not tolerate incidents of unethical business behaviour.

(iii) **Loss/damage recovery actions:**

Based on the results of the investigation performed, all actions possible are taken, with external assistance where required, to recover the Company's funds or assets which were misappropriated. Based on the results of the investigation, consideration is given to the possibility of legal proceedings against the offending parties to obtain the appropriate remedies.

6. Monitoring and review:

This relates to financial controls which are sensitive to the risks of bribery considering how regularly company need to review the policies and procedures, and to consider whether external verification is necessary. Internal checking and monitoring is the regular processes by which the Senior Management Team obtains the assurance they require that the Company's risks are properly identified, evaluated, and managed. The primary role of the inspection and monitoring team within the Company is that of risk assessment, evaluating and to control this kind of incidence effectively to mitigate risks and determining the levels of compliance.

Consistent with the Company's risk management processes, risk-based reports are prepared and approved by the monitoring team on an annual basis. In the context of bribery, in performing its monitoring activities as per the guidelines and procedures of the company.

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All control weaknesses, which are identified during the meetings of reviews, shall be communicated in a standard reporting format, which includes an agreed remedial action plan, to the relevant service. Details of any bribery risks identified by the team, which likely to be resulting in financial loss and/or reputational damage of the company (together with the audit steps taken to detect such risks) are shared with the service and remedial action required to address any bribery risks identified is agreed.

The results of all such reports are reported to the senior management in order to control, check, not to repeat the incidents in the organisation with all seriousness to safeguard the interests and image of the company.



**ED and Group CEO
B R Preetham**

Date: 01.10.2023 Rev 03.

Amendment History:

SI No	Issue No	Rev. No.	Revision Date	Reasons for Change	Details of Changes Made
1	1	0	04.08.2017	As per IATF	Prepared as per IATF 16949 :2016 standard requirements
2	1	1	25.08.2018	Name change	Sansera Engineering Pvt Ltd., has been changed to Sansera Engineering Limited
3	1	2	07.08.2019	Designation change	JMD Designation changed BOD meeting
4	1	3	01.10.2023	Reviewed	Policy reviewed with Envint consultant and Zero tolerance point added , Approved by ED and GrCEO Information/ Resources and Contact Details