



Anti-bribery Policy

Gifts, Hospitality, and Bribery Policy

1) Why this Policy?

At Squatrix Solutions, maintaining integrity and transparency in all business dealings is critical. Offering and receiving gifts and hospitality are common in client relationships, but we must ensure these gestures are not perceived as attempts to unduly influence business decisions or actions. This policy aims to provide clear guidance on managing gifts, hospitality, and bribery to uphold our commitment to ethical behavior and transparency in all our dealings.

2) Guiding Principles for this Policy:

This policy is built on core values that guide Squatrix Solutions' behavior:

- **Ethical Conduct:** All employees are expected to act with integrity, ensuring our actions align with the highest ethical standards.
- **Transparency:** Any form of gift or hospitality must be transparent and must not appear to influence business decisions.
- **Respect:** We respect all stakeholders, ensuring that all interactions are based on professional conduct and mutual respect.

3) What Does this Policy Cover?

a) **Scope:** This policy applies to all employees, members of the board, and business partners of Squatrix Solutions.

b) **Bribes:** A bribe is defined as any offering of cash, gifts, services, or favors to influence the actions or decisions of another party, including government officials, clients, or third-party organizations.

4) Processes:

a) Prohibition of Bribes:

- i) All employees, board members, and business partners are strictly prohibited from offering, promising, or accepting bribes in any form.
- ii) Any attempt to offer or accept bribes should be immediately reported to the Director.

b) Government Officials:

Squatrix Solutions prohibits giving or offering any form of gift, payment, or hospitality to government officials or public employees that may be construed as bribery or to gain unlawful advantages.



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c) Third-Party Relations:

All agents, consultants, and third-party vendors working with Squatrix Solutions are required to adhere to this policy. Regular reviews of compliance with the policy will be conducted, and failure to comply may result in termination of the business relationship.

d) Charitable Contributions and Political Donations:

Squatrix Solutions does not make contributions to external entities, including charitable organizations or political parties, without prior approval from the Board.

e) Permissible Gifts and Hospitality:

Squatrix Solutions acknowledges the tradition of exchanging gifts and hospitality as a cultural gesture. However, the value of gifts should not exceed ₹2000 in a year, and they should not be given or accepted during any active negotiations or to create undue influence.

f) Company Events:

Events organized by Squatrix Solutions for clients or external stakeholders must be approved by the Board. Any event that may create the appearance of undue influence must be carefully reviewed and approved.

g) Non-Adherence:

Any violation of this policy must be reported to the Directors. Upon investigation, appropriate actions will be taken, and the issue will be communicated back to the concerned parties.

5) Grievance and Suggestions:

Any grievances or suggestions for improvement regarding this policy should be addressed directly to the Directors through official channels.