

QACA Anti - Bribery & Anti - Corruption Policy

Anti Bribery

QACA-P-02-Rev00

Date: 17/10/2023

Contents

| | | |
|------|--|---|
| I. | Introduction | 2 |
| | Purpose..... | 2 |
| | Scope..... | 2 |
| II. | Description of Bribery & Corruption | 2 |
| | Gifts & Hospitality | 3 |
| | Facilitation..... | 4 |
| | Kickbacks | 4 |
| III. | Staff Training | 4 |
| IV. | Raising of Concern | 4 |
| | Ombudsman & Speak-up..... | 4 |

Introduction

It is the policy of Quality Austria Central Asia Private Limited (QACA), to maintain the highest standards of ethical behaviour in all of our business dealings in all geographies we operate in. QACA is committed to conducting itself fairly, honestly and lawfully in all its business dealings and relationships and has a zero-tolerance approach to bribery and corruption.

We uphold all laws relevant to countering bribery and corruption applicable to us under the Indian Prevention of Corruption Act, 1988 (“PCA”), and to any law as applicable in the countries we offer our services in.

Purpose

The purpose of this Policy is to state QACA’s position on bribery and corruption and have clear and consistent rules to prevent both active and passive bribery, as part of the company’s anti-bribery policy. A breach of applicable anti-bribery laws (including the failure to prevent bribery occurring) results in reputational damage and severe penalties, including fines and imprisonment. The requirements of this policy demonstrates company’s zero tolerance approach to bribery and corruption.

Scope

This policy applies to all employees, external resources, suppliers, agents and temporary resource (including but not limited to consultants, contractors and agency workers) (“Staff”) and any other person or organization who performs services for, or on behalf of, QACA in any location around the world.

Description of Bribery & Corruption

“Bribery” is defined as promising, offering or giving an undue advantage to a person or entity, either directly or through an intermediary, in order that the person or entity should perform or refrain from performing, any action, in breach of their business or public duties.

A bribe is an enticement, reward or anything of value including any financial or other advantage given, offered, requested, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage, or to improperly influence any act or decision of any person.

Corruption is the misuse of entrusted power for personal gain. Acts of bribery or corruption are designed to influence the individual in the performance of their duty and induce them to act in a contrary manner.

Inducements can take the form of gifts, fees, rewards, jobs, internships, favours or other advantages such as complimentary concert tickets and/ or inappropriate access to sporting events.

Common examples, but not limited, of bribery include:

1. Cash or other forms of payment to secure a contract or obtain a license.
2. Improper donations to political parties or related organizations.
3. Excessive gifts or entertainment intended to influence the recipient to undertake a particular course of action.
4. Donations with an ulterior motive.
5. Payment of travel expenses or accommodation for a customer or official when there is no underlying business purpose for a trip.
6. Use of corporate assets for activities which are unrelated to our business or approved charitable purposes.

Conflicts of interest can arise when financial or personal considerations may influence or appear to influence the Judgment or actions of our employees in performing their duties, or have the potential to do so. Such conflicts can occur when personal and company interests are mixed or when business or governmental decisions are based on personal interest.

Gifts & Hospitality

The exchange of modest gifts and entertainment may help to build goodwill and this policy is not intended to detract from the desirability of fostering good relations with business partners and other stakeholders through legitimate, occasional social interactions. However, offering or providing inappropriate gifts or entertainment may cause embarrassment to QACA and damage our reputation. Particular concerns arise when the offering of gifts and entertainment may be connected in some way with an actual or potential business transaction or regulatory approval. Even if the intent is not corrupt, there is still a risk that a recipient or an objective third party may perceive the gift or entertainment to be an attempt to gain an improper advantage.

Any gift or entertainment is always unacceptable if it is offered or made in exchange for a contract, a permit or any other specific benefit, such as:

- is offered to obtain an improper advantage in the conduct of business.
- is in breach of local or international bribery laws.

- would be considered unacceptable if offered by a supplier or business partner to one of our own employees; and would, if it became public, adversely affect our reputation. It is important that gifts or hospitality never influence business decision-making processes, or cause others to perceive an influence.

Any gift received by a member of staff, which exceeds Indian Rupees 1000 needs to be notified to immediate Manager for approval.

Facilitation

Facilitation payments are payments or fees paid either directly or through an agent or middle man to government or other officials to speed up or facilitate the performance of routine action (such as the provision of a NOC or completion certificate for job already completed)

Kickbacks

A kickback is an illegal payment intended as compensation for preferential treatment or any other type of improper services received. Kickbacks are often referred to as a type of bribery. While kickbacks can take many different forms, they all feature some sort of collusion between two parties.

Staff Training

Mandatory training with test of Understanding, on this policy will form part of the induction process for all new employees.

All existing staff will receive mandatory annual training with a test of understanding and be provided with regular, relevant updates on how to implement and adhere to this policy. A minimum 80% scoring will be required as form of completion.

Raising of Concern

Ombudsman & Speak-up

To have effective control mechanism and to address complaints addressed properly an Ombudsperson has been established at Quality Austria Central Asia Pvt. Ltd. who will investigate all the complaints pertaining to bribery and corruption and will take adequate action on priority. He/She can be reached at ombudsman@qacamail.com

Any member of the staff should bring to the notice of their manager, any observed act or behaviour that does not comply to this policy. Managers are responsible for initiating appropriate actions, that may result in independent investigation and the prescribed action been taken. There should be no attempt to brush under the carpet, hide or minimize the incident. Records shall be maintained of the reported incidents together with the investigation and concluding actions. Records shall also be maintained in HR personal files of individuals involved in such incidents.

| Revision Number | Date | Revised by | Approved by | Summary of changes |
|-----------------|-------------|-------------|-------------|--------------------|
| QAPA-P-01-Rev00 | 02 Aug 2023 | Mini Sharma | QACA Board | - |

