

Anti-bribery and corruption policy

Introduction

Redefine Marcom Pvt Ltd is committed to conduct all its business activities in an honest and ethical manner, no matter who it deals with or where it may operate. As a part of this commitment, Redefine Marcom will not tolerate any form of bribery and corruption, and it will also not indulge in any act of bribery or corruption to generate business from any entity.

This anti-bribery and corruption policy sets out Redefine's policies to prevent acts of bribery and corruption. These policies and procedures have been designed to comply with legislations governing bribery and corruption on a global basis.

Who This Applies To?

This policy applies to all Redefine officers, employees (full and part time) and temporary workers (such as consultants or contractors) (together referred to as "employees" in this document) across the group no matter where they are located or what they do. It is the responsibility of every employee at Redefine to ensure that they comply with these standards in their daily working lives.

Part of Redefine's commitment to prevent bribery and corruption is to ensure that the people acting on our behalf (third parties & associates) also do so in compliance with effective anti-bribery and corruption policies. Accordingly, where we engage third parties such as agents, distributors or joint venture partners, we have obligations to complete sufficient due diligence when entering into arrangements to ensure that they are not acting corruptly, and to periodically monitor their performance to ensure ongoing compliance.

What is Bribery?

Bribery involves the following:

- when a financial or other advantage is offered, given or promised to another person with the intention to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or
- when a financial or other advantage is requested, agreed to be received or accepted by another person with the intention of inducing or rewarding them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

It does not matter whether the bribe is:

- given or received directly or through a third party (such as someone acting on Redefine's behalf, for example an agent, distributor, supplier, joint venture partner or other intermediary); or
- for the benefit of the recipient or some other person.

Bribery can take the following forms-

- money (or cash equivalent such as shares);
- unreasonable gifts, entertainment or hospitality;
- kickbacks;
- unwarranted rebates or excessive commissions (e.g. to sales agents or marketing agents);
- unwarranted allowances or expenses;
- “facilitation” payments/payments made to perform their normal job more quickly and/or prioritise a particular customer;
- political/charitable contributions;
- uncompensated use of company services or facilities; or
- anything else of value

This policy applies to Redefine’s dealings with both the public and private sectors.

Compliance to the Policy

Failure to comply with this policy, whether or not this is intentional, may lead to disciplinary action (up to and including dismissal), and criminal liability for the individual involved (up to and including imprisonment). Employees will be required to confirm that they have read and understood the policy and that they comply with its terms as part of their ongoing employment assessment processes. In addition, relevant employees will be required to attend training to support the guidance in this policy.

Third Parties & Associates- Redefine will develop procedures for conducting appropriate risk-based due diligence on third parties and associates, and will implement appropriate steps to address any identified risks to ensure compliance with applicable anti-corruption laws.

Monitoring & Review

Human Resource Department of Redefine will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal controls and systems will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.