

RPSG Ventures Limited
Anti-Corruption and Anti-Bribery Policy

Purpose of this Policy

RPSG Ventures Limited ('RVL', 'the Company') values its reputation for conducting business in an ethical and transparent manner. It also recognises that it would suffer tangible and intangible losses including reputational losses, if there is an involvement in bribery at a corporate level and/or by any employee, agent, representative, vendor or business partner of the Company.

RVL has designed this Anti-Bribery Policy to ensure adherence to the highest ethical standards, in compliance with the applicable local anti-bribery laws. This Policy will also enable employees, agents, representatives, vendors and business partners to identify and effectively report a potential breach. Any breach of this Policy will be treated seriously by the Company and is likely to result in disciplinary action, which may even include temporary suspension and/or termination of employment of employee(s) and the immediate termination of any vendor or business partner arrangement(s).

RVL has a “zero tolerance” policy towards bribery.

Policy coverage

All employees representing the businesses of the Company, agents, representatives, vendors and business partners must become familiar and comply with the Policy.

What is Bribery?

Bribery is an inducement or reward received, offered, promised, or provided to gain a personal, commercial or contractual advantage. An inducement or reward could be in the nature of cash, entertainment, loans, inflated commissions, unauthorized rebates, other advantages to which the person is not normally entitled to.

Key Prohibitions

The key prohibitions as part of this Policy are:

1. Offering, promising or giving a financial or other advantage to another person to induce a person or organization to perform improperly a relevant function or to reward a person or organization for the improper performance of such a function or activity
2. Requesting, agreeing to receive, agreeing to give or accepting a financial or other advantage to perform improperly a relevant function or activity
3. Making facilitation payments, even if this represents local practice or custom

4. Guidance on specific areas:

a. Gifts and Entertainment

It might be customary, at times, to give or exchange gifts during the traditional festive seasons or during certain corporate events. In addition, it may be business custom to accept and/or provide entertainment to a third party. RVL prohibits receipt or giving of any gifts with an intent to derive any benefit in return.

b. Political contributions

Any political contribution may be made strictly in adherence with applicable laws in force.

c. Charitable contributions

Any charitable contribution may be made strictly in adherence with applicable laws in force.

d. Facilitation payments

Facilitation payments (made to expedite the performance of a routine action by any person or organization) are strictly prohibited.

e. Expense reimbursements

All expenses must be incurred with necessary approval(s) and must be presented along with all relevant supporting documentation(s) such as invoices or receipts. Any inaccurate or misleading claims are strictly in breach of this Policy.

f. Third Parties

The Company is required to conduct a risk based due diligence on third parties it has business dealings with. Any payment which is improper in nature (including bribes) must not be routed through a third party.

Reporting Concerns

The prevention, detection and reporting of bribery is the responsibility of all employees, agents, representatives, vendors and business partners. The Company is committed to ensuring that all of its have a safe, reliable, and confidential way of reporting any suspicious activity and can raise concerns.

RVL is further committed to ensuring that no one suffers detrimental treatment through refusing to take part in bribery, or because of reporting a concern in good faith.

Any concerns regarding bribery can be reported at rpsgventures@rpsg.in. This facility is available to employees, agents, representatives, vendors and business partners for raising their concerns. They can report their concerns in confidence and without fear of retribution. RVL prohibits retribution against any complainant and if this were to arise, appropriate penal action will be taken against the individuals involved in such retribution. All reports raised are taken seriously and, where appropriate, will be investigated fully.

RVL recognizes that industry practices may vary from country to country or from culture to culture. Nevertheless, a strict adherence to the guidelines set out in this Policy is expected of all employees, agents, representatives, vendors and business partners at all times.

If in doubt as to what might amount to bribery or what might constitute a breach of this Policy, then the Risk Management Committee of the Board of Directors may be contacted in writing to rpsgventures@rpsg.in