

ANTI BRIBERY AND ANTI CORRUPTION POLICY

DGP NETWORK SOLUTIONS PVT. LIMITED

1. Policy Statement:

- This Anti-Bribery and Corruption Policy sets out the efforts of DGP Network Solutions Pvt Limited (referred to as 'DGP/Company/Organisation') in mitigating bribery and corruption. It is our policy to conduct all our business in an honest and ethical manner. The objective of the policy is to emphasize DGP 'Zero Tolerance' approach towards bribery and corruption and commitment to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery. Our employees and temporary workers are prohibited from engaging in any bribery or potential bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties. If any associate suspects or becomes aware of any potential bribery involving the Company, it is the duty of that associate to report their suspicion or awareness to the Company Corporate HR.
- The Company will undertake a periodic bribery and corruption risk assessment across its business to understand the bribery and corruption risks it faces and ensure that it has adequate procedures in place to address those risks.
- The purpose of this policy is to:
 - a) set out our responsibilities to comply with laws against bribery and corruption;
 - b) provide guidance on how to recognise and deal with bribery and corruption issues.

2. Compliance:

- The scope of this Anti-Bribery and Corruption Policy extends to DGP and all its related subsidiaries and related entities and affiliates anywhere in the world and at all levels and grades.

3. What is Bribery? Bribery is:

- a) The offering, promising, giving or accepting any gift, hospitality, loan, fee, reward or soliciting of any advantage as an inducement for an action which is dishonest, illegal, unethical or a breach of trust, duty, good faith or impartiality in the performance of a person's functions or activities.
- b) The offering, promising or giving of any gift, hospitality, loan, fee, reward or other advantage to a public official with the intention of influencing the public official in the performance of their public function, to obtain a business advantage.

4. Responsibilities of Associates:

- All our associates must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy. Prevention, detection and reporting of corruption are the responsibility of all those working for us or under our control. All associates are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- Associates must notify their reporting manager or consult an appropriate member of the HR team as soon as possible if they believe or suspect, that a breach of this policy has occurred, or may occur in the future. Please note that a failure to report an actual or suspected breach of this policy is itself a breach of this policy. Any associate who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct.
- DGP as a part of fair practices does not pay and accept bribes, either directly or via third parties, in any manner or circumstances. Any violation or breach to this principle by an employee will be viewed seriously and treated as an act of gross misconduct.

5. Acts not Acceptable - It is not acceptable to:

- a) give, or offer, a payment, gift or hospitality to secure or award an improper business advantage;
- b) give, or offer, a payment, gift or hospitality to a government official, agent or representative to facilitate, expedite, or reward any action or procedure;
- c) accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them;
- d) induce another individual or associate to indulge in any of the acts prohibited in this policy;
- e) threaten or retaliate against another associate who has refused to commit a bribery offence or who has raised concerns under this policy;
- f) give or accept any gift where such gift is or could reasonably be perceived to be a contravention of this policy and / or applicable law; or
- g) engage in any activity that might lead to a breach of this policy.

6. Gifts and Hospitality:

- This policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations.
- Gifts and Hospitality: a) Must be duly approved; b) Must not be intended to improperly influence; c) Must not have appearance of improper influence; d) Modest promotional gifts permitted; e) Illegal/cash gifts strictly prohibited; f) Payments from personal accounts prohibited.

7. Review & Record Keeping:

• DGP Solutions will keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to, and receiving payments from, third parties. Associates must ensure that all expense claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Company's applicable policy and specifically record the reason for such expenditure. Associates shall further ensure that all expense claims shall comply with the terms and conditions of this policy. DGP will monitor, review and annually report the effectiveness of this Anti-Bribery and Corruption Policy. The report will be submitted annually for approval to the Board of Directors. DGP will ensure safe record-keeping of such reviews and timely submission of such reports of such reviews to the senior management.

8. Employee Conduct:

• Employees are required to report any knowledge / suspicion of receipt or payment of a bribe. Known suppression of knowledge will also be treated as misconduct. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter and consult an appropriate member of the HR team. DGP regards reporting of any instance of bribery or attempted bribery as a responsible 'whistleblowing' and affirms that such employees do not suffer workplace harassment, bullying, demotion, penalty, or other adverse consequence.

9. Contractors and Vendors:

• DGP requires screening procedures to be carried out on those of its agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to DGP to protect DGP from reputational risk of being associated with illegal or corrupt payments.
• DGP requires all its Associates, Contractors and Vendors are made aware of its Anti-Bribery Principles and Practical Procedures and they reaffirm faith that they do not indulge in any act which is in violation of this Anti-Bribery and Anti-Corruption Policy.

10. Training:

• Compulsory training will be provided to all employees during induction in ensuring their awareness of this Anti-Bribery and Corruption Policy, relevant legislation and their obligations under this Anti-Bribery and Anti-Corruption Policy including the code of conduct set as part of their employment. The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter.

11. Remedies & Discipline:

• If the Organisation determines that a case of bribery or corruption has occurred, it will take the following action to correct it:
o Any person found guilty of violation of the DGPs Anti-Bribery and Anti-Corruption Policy, will be subject to disciplinary action up to and including termination of employment.
o Appropriate procedures, policies and controls will be established in all departments to ensure early detection of similar violation.
o During the investigation period or at any time thereafter, if any employee is found to be retaliating against the complainant, coaching witnesses or tampering with evidence, then it would lead to severe disciplinary action including termination of employment.

12. Disclaimer:

• DGP will not be liable and shall not hold any responsibility for any acts of omissions that the participants (Employees, Contractors and/or Vendors) under this policy may commit in their personal capacity.

13. Amendment:

• Any change in this Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.

ANTI-BRIBERY & CORRUPTION COMPLIANCE UNDERTAKING**MANDATORY FORM**

I hereby solemnly affirm that I have read, understood and agree to strictly comply with all clauses of this Policy.

Employee Full Name	_____
Employee ID / Designation	ID: _____ Designation: _____
Department / Base Location	Dept: _____ Location: _____

SIGNATURE OF EMPLOYEE

(Affix Physical Signature / Stamp Digital E-Sign Here)

Date: ____ / ____ / 2026

Place: _____

DGP CORPORATE AUTHORIZED SEAL**UMESH AHIRWAR**

Digitally Signed by Umesh Ahirwar

DGP Network Solutions Pvt. Ltd.

Authorized Signatory - Corporate Ethics

Status: Statutorily Verified & Approved

Authority: Head - HR Operations

Base Office: Gujarat, India