

ANTI – BRIBERY & ANTI – CORRUPTION POLICY

Background:

Sunteck Realty Limited (hereinafter referred to as “**Sunteck**” or “**The Company**”) is one of the fastest growing Maharashtra-based luxury real estate company, engaged in the business of construction, development, leasing, and management of commercial and residential properties.

Sunteck Realty Limited together with its subsidiaries, group companies are hereinafter referred to as Sunteck Group (the “**Group**”).

Policy Statement:

The Company strives to operate its businesses conforming to the highest moral, legal, and ethical standards and does not tolerate bribery or corruption in any form. The Company mandates compliance with all applicable anti-bribery and anti-corruption laws at the state level and at the applicable jurisdictions in which it operates. This Policy is aligned with the extant regulations.

Purpose:

The purpose of this Anti-Bribery and Anti-Corruption Policy (“**Policy**”) is to endeavor that the Company sets up adequate procedures in order to prevent the Company’s involvement in any activity relating to bribery, facilitation payments, or corruption, even where the involvement may be unintentional.

Scope:

This Policy is applicable to the Company, its subsidiaries, associates, and any person/entities over which company has management control.

Compliance Committee:

The Company strives to form a compliance committee with a dedicated compliance officer reporting to the senior management level. The Compliance function will be supported by compliance staff which will be responsible for effectively implementing the compliance program. The compliance function will be responsible for receiving and investigating all complaints and submitting results of investigation findings to the Grievance Committee for decision making.

Board and Management Oversight:

The Company’s Board and Senior management shall provide clear oversight and strive to demonstrate their commitment to prevent bribery and corruption. The Company shall preserve records pertaining to cases/complaints received resolution and/or closure for a period of up to 2 years. The relevant sections of the Company’s code of policies including section 6 & 8 shall guide the Board and management oversight.

Definitions:

Bribe/Bribery: Act of giving, promising, offering of money, favor or something valuable to a person or authorizing such an act in order to influence the judgment or conduct of that person, procure services, gain undue influence or undue advantage. A bribe may be monetary or non-monetary, tangible or intangible.

Corruption: A form of dishonesty or a criminal offense which is undertaken by a person or an organization which is entrusted with a position of authority, in order to acquire illicit benefits or abuse power for one's private gain. Proposing an advantage with an illegal purpose is already a corruption, even if it was never acted upon. Active corruption consists of offering an advantage. Passive corruption consists of accepting an advantage.

Facilitation payments: Money offered to government authorities to facilitate or expedite a service that the payer is not entitled to.

Collusive Practice: An arrangement between two or more parties designed to achieve an illegal purpose, including to influence improperly the actions of another party.

Coercive Practice: Persuading someone to do something by using some force or threat with malicious intention.

Adherence:

As the Company continues to expand its foothold geographically, employees are involved in a range of transactions and projects in complex jurisdictions. This includes conducting business operations in various locations and dealing with multiple people where bribes, collusion, corruption, kickbacks, and facilitation payments may be viewed as a part of regular business practices. Employees are expected to nullify any behavior that is expressly prohibited by anti-corruption legislation in all circumstances and must use their judgment to nullify behaviors that even risk the appearance of corruption.

The Company does not tolerate bribery of any kind, never offers, provides, or authorizes bribes of any kind, including facilitation payments, to a public official or a private individual and/or any other entity or any practice which is collusive or coercive in nature.

Generally, a bribe may take the form of, or be facilitated through:

- Payments of money outside the normal course of business
- Gifts or entertainment.
- Rebates or kickbacks in relation to services provided.
- Use of assets at a discount or free of charge.
- Sponsorships, donations, charitable contributions, political contributions, and community investments.

However, this Policy does not prohibit the aforesaid activities, so long it is reasonable, appropriate, modest, and bona fide corporate hospitality, and if its purpose is to improve our company image, present our services, or establish cordial relations. Following this, any gifts, hospitality, entertainment, travel expenses, donations, sponsorships made or received shall not exceed 5% of consolidated revenue except for CSR activities undertaken by the Company as per applicable laws and necessary approval should be taken in advance from the Board of

Directors of the Company. All such contributions will be evidenced by a receipt/acknowledgement that should be documented and maintained on record.

Any political contributions made by or on behalf of the Company and any solicitations for political contributions of any kind must be lawful and in compliance with the Companies Act and Companies policies.

Also, giving or receiving gifts/discounts may be acceptable if they are of low intrinsic value, or they have been made in the normal course of business and do not influence the receiver, or does not include any promise that will give the person any advantage by virtue of giving the promise.

Risk Management:

The Company maintains adequate internal controls to protect assets, ensure accurate accounting, and deter corruption, fraud, and bribery. The internal control systems will cover accounting and recordkeeping practices, to regular review and audit to provide assurance on the policy's design, implementation, and its effectiveness.

The Company will establish and adopt a Risk Assessment approach designed to assess the nature and extent of the inherent risks related to bribery and corruption to which the Company is exposed, and the effectiveness of controls designed to mitigate those risks covering fraud, bribery, corruption, sanctions, and other integrity risks.

The Company will strive to have adequate restrictions while appointing any retired public official (If any) to eliminate the possibility of any conflict to interest

Due Diligence:

The Company shall establish due diligence and screening process for employees, channel partners and key contractors. Specific due diligence procedures and guidelines shall be defined to ensure thorough scrutiny of individuals and organizations before engaging in any business relationships.

Reciprocal Integrity:

The Company will communicate entities/business partners it engages with, of the Company's anti-bribery anti-corruption Policy, and seek a reciprocal commitment.

Whistle-blowing Mechanism:

The Company has a dedicated whistle blowing mechanism in order to facilitate the reporting of complaints related to bribery, corruption, fraud and unethical behavior. For additional details, refer our whistle blowing policy.

Company's Approach:

The Company endeavors to tackling bribery at the highest level.

Each Employee should endeavor to adopt a zero-tolerance approach towards all forms of corruption, including bribery, kickbacks, and facilitation payments. To avoid corruption, employees are expected to:

- Never offer, pay, request, facilitate or accept bribes or kickbacks, even if requested or directed to do so by a senior manager.
- Never authorize any corrupt activities or behaviors.
- Never turn a blind eye to potentially corrupt behavior by subordinates or business partners acting on the Company's behalf.
- Never engage in activities that could facilitate corruption, including drafting illegal agreements, drafting fraudulent claims, falsifying evidence, and giving false evidence in legal proceedings.

Consequence of Non-Compliance:

Failure to comply with the Policy, in accordance with the severity or frequency of such a breach or retaliation against any individual for reporting a violation may result in heavy sanctions and potential criminal liability for the company, management, and the workforce involved. Personnel involved in the non-compliance are subject to disciplinary sanctions that may range from warning to permanent termination of employment to civil / criminal action as per the applicable law/s.

Transparency:

Every workforce member is responsible for accurately maintaining and reporting records of expenditures relating to gifts or travel to the Company in accordance with the applicable procedures. If a payment or other transaction is not reflected in Company's records in a manner that accurately and transparently reflects the nature and purpose of the payment or other transaction, that inaccurate record may be a violation of the law.

Awareness & Training:

Company will provide training on the Policy to all the existing as well as new employees regularly from time to time.

All the employees conforming / complying the policy components would be eligible for any trainings required for skill development thereby benefiting both the company and the said personnel.