

SECUMAX Anti-Bribery Policy

1. Purpose SECUMAX is committed to maintaining the highest standards of integrity and ethical conduct in all its business dealings. This policy aims to prevent, detect, and address bribery and corruption within the organization and its business relationships.

2. Scope This policy applies to all employees, directors, contractors, agents, suppliers, and business partners associated with SECUMAX, regardless of location.

3. Policy Statement SECUMAX has a zero-tolerance approach to bribery and corruption. We are committed to:

- Compliance with all applicable anti-bribery laws and regulations.
- Promoting a culture of integrity and transparency.
- Ensuring that no one acting on behalf of SECUMAX engages in bribery or corrupt practices.

4. Definitions

- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence a decision or gain an unfair advantage.
- **Facilitation Payments:** Small payments made to expedite routine government actions. These are prohibited under this policy.

5. Responsibilities

5.1. Management Management is responsible for:

- Demonstrating leadership and commitment to anti-bribery principles.
- Ensuring compliance with this policy within their areas of control.
- Providing resources for anti-bribery training and awareness.

5.2. Employees Employees are expected to:

- Adhere to this policy and all relevant laws.
- Follow Whistle Blower Policy

5.3. Suppliers and Business Partners Suppliers and business partners must:

- Comply with this policy and applicable laws.
- Avoid offering or accepting bribes in any form.
- Cooperate with audits and investigations as required.

6. Prohibited Practices

- Offering or accepting bribes in any form.
- Making or authorizing facilitation payments.
- Providing or accepting gifts, entertainment, or hospitality that could influence business decisions.

7. Due Diligence SECUMAX conducts due diligence on suppliers, contractors, and business partners to ensure compliance with anti-bribery standards, including:

- Screening for potential risks.
- Including anti-bribery clauses in contracts.
- Monitoring ongoing compliance.

8. Training and Awareness SECUMAX provides regular training to employees and key stakeholders to:

- Raise awareness about anti-bribery laws and company policies.
- Equip them to identify and address bribery risks.

9. Reporting Mechanism Suspected bribery or corruption should be reported promptly through the confidential reporting channel: Email ID: helpdesk@SECUMAX.in or Phone:

Contact: Venkatesh Bhaskar, Ashok HB or Shruthi Bhaskar KK

Reports will be treated with confidentiality and investigated thoroughly.

10. Monitoring and Review This policy will be reviewed annually or as necessary to ensure effectiveness and compliance with evolving regulations.

11. Non-Compliance Violations of this policy will result in disciplinary action, up to and including termination of employment or contracts. Legal action may also be taken where appropriate.

12. Approval This policy has been approved by the SECUMAX Proprietor and is effective as of [Insert Date].
