

Anti-Bribery & Anti-Corruption (ABAC) Policy and Code of Business Ethics (CBE)

Company: Deepsense Digital Solutions

Location: Kodambakkam, Chennai, India

Applicability: All employees, subcontractors, suppliers, business partners

1. Purpose

Deepsense Digital Solutions is committed to conducting all its business activities with the highest standards of integrity, transparency, and ethical conduct. This Anti-Bribery & Anti-Corruption (ABAC) Policy and Code of Business Ethics (CBE) establishes a zero-tolerance approach towards bribery, corruption, extortion, and unethical practices.

This policy aims to:

- Prevent corruption and unethical influence in business dealings
- Ensure compliance with applicable anti-corruption laws
- Promote ethical decision-making and accountability
- Protect individuals who report violations in good faith

2. Scope

This policy applies to:

- All permanent and contractual employees
- Interns and trainees
- Subcontractors, suppliers, vendors, consultants
- Business partners and any third party acting on behalf of the organization

3. Code of Business Ethics (CBE)

All covered persons are expected to:

- Conduct business honestly, fairly, and professionally
- Comply with all applicable laws and internal policies
- Avoid actions that may damage the organization's reputation
- Declare any actual or potential conflicts of interest
- Uphold the organization's values in all internal and external interactions

Non-compliance with this Code may result in disciplinary action.

Deepsense Digital Solutions Private Limited

No 10, 3rd Floor, 1st Main Rd, United India Colony, Kodambakkam, Chennai, Tamil Nadu 600024 TN.

Ph: 044 - 4302 4282

CIN NO: U51909TN2016PTC112834; www.deepsense.in

4. Anti-Bribery & Anti-Corruption Policy

4.1 Zero Tolerance

Deepsense Digital Solutions strictly prohibits:

- Bribery, kickbacks, facilitation payments, or extortion
- Offering, promising, giving, requesting, or accepting any undue advantage
- Indirect bribery through third parties or intermediaries

This prohibition applies to dealings with government officials, clients, suppliers, and private entities.

4.2 Legal Compliance

The organization complies with:

- Prevention of Corruption Act, 1988 (India)
- Applicable labour and commercial laws
- Client-specific codes of conduct and compliance requirements

5. Gifts & Hospitality Policy

5.1 Guiding Principles

- Gifts or hospitality must never influence or appear to influence business decisions
- Transparency and proportionality must be maintained at all times
- Cash or cash equivalents are strictly prohibited

5.2 Acceptable Gifts & Hospitality

- Nominal-value(₹500), infrequent, and culturally appropriate items
- Business-related meals or hospitality with a legitimate purpose
- Prior approval where required by internal procedures

5.3 Prohibited Gifts & Hospitality

- High-value gifts or luxury items
- Personal favours or benefits
- Gifts or hospitality during tendering, negotiation, or decision-making stages

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All gifts and hospitality, where applicable, must be declared.

6. Conflict of Interest

- Employees and partners must disclose any personal, financial, or relational interests that may conflict with organizational interests
- Conflicts must be declared promptly to HR or Management
- Failure to disclose may result in disciplinary action

7. Communication, Training & Declarations

- The organization shall communicate this policy to all relevant stakeholders
- Periodic training and awareness programs shall be conducted
- Written declarations confirming adherence to this policy shall be obtained
- Training and declaration records shall be retained for employees, subcontractors, suppliers, and business partners, as applicable

8. Reporting & Whistleblower Protection

- All individuals are encouraged to report suspected or actual violations without fear of retaliation
- Reports may be made to HR, Management, or designated grievance channels
- Confidentiality of the complainant shall be maintained
- Retaliation against whistleblowers is strictly prohibited

9. Investigation & Disciplinary Action

- All reported cases shall be investigated promptly and impartially
- Confirmed violations may result in:
 - Written warning or corrective action
 - Suspension
 - Termination of employment or contract
 - Legal proceedings where applicable

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10. Reporting of Confirmed Incidents

The organization shall maintain records of confirmed corruption-related incidents, including:

- Total number of incidents
- Nature of violations
- Actions taken against employees or business partners

These records shall be made available for audits or compliance reviews, as required.

11. Policy Review & Approval

- This policy is approved by Top Management
- It shall be reviewed periodically or upon changes in law or client requirements

Approved By: Directors – Deepsense Digital Solutions

Effective Date: _____

A handwritten signature in black ink, appearing to read "Rakesh R", written over a horizontal line.

**Rakesh R - Director
Deepsense Digital Solutions Pvt**