



# SHYAMA COMPUTRONICS AND SERVICES LIMITED

*(Formerly known as Shyama Infosys Limited)*

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## ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

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**Effective- May 29, 2024**

[As approved by Board of Directors on May 29, 2024]

**Shyama Computronics and Services Limited**

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## ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

### 1. Purpose of this Policy

Shyama Computronics and Services Limited (formerly known as Shyama Infosys Limited) values its reputation for conducting business in an ethical and transparent manner. The Company's core principle states that the company is operating its business with the highest moral and ethical standards. The Company does not tolerate any form of bribery or corruption.

The Company has designed this Anti-Bribery and Anti-Corruption Policy to ensure adherence to the highest ethical standards, in compliance with the applicable local anti-bribery laws. The purpose of this Anti-Bribery and Anti-Corruption Policy is to ensure 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. It requires employees, directors, officers of the Company and third parties subject to this Anti-Bribery and Anti-Corruption Policy to recognize questionable transactions, behavior or conduct, and take necessary steps to record such activities. The Company has laid down procedures to deal with such behaviors or conduct.

### 2. Policy coverage

The Policy is applicable to all individuals working at all levels and grades, including directors, senior managers, officers, other employees (whether permanent or temporary), consultants, or any other person associated with our Company.

### 3. Definitions

- I. **Bribery:** means directly or indirectly offering, promising or accepting an undue advantage as an encouragement for an action which is illegal, unethical or a breach of trust. Bribery constitutes a crime and both the offeror and the recipient can be criminally charged. ABAC Policy prohibits persons from giving bribes not only to any public or government official but also to any private individual. Bribery in any form will not be tolerated.
- II. **Corruption:** is 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. Corruption may include activities like bribery or embezzlement.
- III. **Facilitation Payments:** unofficial payment made to a government official in order to speed up the performance or non-performance of a necessary action or activity. Facilitation Payments are used to speed up the process. These are not legitimate payments.
- IV. **Government or Government Organization:** it is the responsibility of the Company to conduct activities in compliance with Anti-Bribery and Anti-Corruption Laws. The Law prohibits improper or unethical payments to Government Official or Government Organizations. Payment conveyed to a Government Official should be fully transparent and properly documented. Government or Government Organization may include any department, any agency, any administration controlled in whole or in part by the government and any organization considered to be a government department or administrative office under any local law.
- V. **Third Party:** individual or organization which comes into contact with the Company or transacts with the Company, then that individual or organization is known as a third party. It also includes vendors, advisors or consultants. Payments made to third parties should be reasonable in relation

to the service provided by them. Such payments should be documented in the Company's books and records.

4. **BOOKS, RECORDS AND INTERNAL CONTROLS:** Company is required to maintain Internal Controls to prevent and detect potential violations of policies and of applicable laws. Internal controls are processes that monitor compliance with the Company's policies. The Company has appropriate controls to ensure that diligence is conducted, transactions properly approved, documentation received to support expenses, and interactions handled as required by our policies.
5. **COMMUNICATION AND COMPLIANCE TRAINING:** Company should ensure that it has undertaken adequate procedures in order to combat the risks and threats. In relation with the Anti-bribery and Anti-Corruption Policy, trainings should be made available to all units of the Company.
6. **RAISING A CONCERN:** Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the Chief Compliance Officer. Concerns should be reported by following the procedure set out in "Whistle-Blower" policy.

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