



## SAP PRINT SOLUTIONS PVT. LTD.

- 📍 28A, Lakshmi Industrial Estate, S.N. Path, Lower Parel (W), Mumbai - 400 013, Maharashtra, India.
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# ANTI -BRIBERY POLICY

## POLICY STATEMENT

It is **SAP PRINT SOLUTIONS PVT. LTD.** policy to comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and all applicable local laws where **SAP PRINT SOLUTIONS PVT. LTD.** so accurately reflects all transactions on SAP PRINT SOLUTIONS PVT. LTD.'s books and records. It is also **SAP PRINT SOLUTIONS PVT. LTD.**'s policy to require those agents, consultants and business partners who work on **SAP PRINT SOLUTIONS PVT. LTD.**'s behalf before Government Officials to comply with these same laws and practices.

## ANTI BRIBERY

**SAP PRINT SOLUTIONS PVT. LTD.** Anti-Bribery Policy: covering the giving and acceptance of bribes

## INTRODUCTION

**SAP PRINT SOLUTIONS PVT. LTD.** Values its reputation for ethical behavior and for financial probity and reliability. It recognizes that over and above the commission of any crime, any involvement in bribery will also reflect adversely on its image and reputation. Its aim therefore is to limit its exposure to bribery by:

- Setting out a clear anti-bribery policy;
- Training all employees so that they can recognize and avoid the use of bribery by themselves and others;
- Encouraging its employees to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication and ensuring sensitive information is treated appropriately.
- Rigorously investigating instances of alleged bribery and assisting the police and other appropriate authorities in any resultant prosecution;

Taking firm and vigorous action against any individual(s) involved in bribery.

## EMPLOYEE RESPONSIBILITY

The prevention, detection and reporting of bribery is the responsibility of all employees throughout the Group. Suitable channels of communication by which employees or others can report confidentially any suspicion of bribery will be maintained via the whistle blower's hotline.

**Works 1:**  
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Tel.: 0250 6061222 / 23 / 24

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**SAP PRINT SOLUTIONS PVT. LTD's**. Board of Directors and I expect that all of our officers, associates and agents will always conduct **SAP PRINT SOLUTIONS PVT. LTD's**. business in accordance with the highest standards of ethical behavior and honesty.

**SAP PRINT SOLUTIONS PVT. LTD.** continued expansion of operations worldwide provides exciting new business opportunities, while at the same time presenting new challenges to maintaining our commitment to the highest ethical standards.

Among the most significant laws and regulations that govern **SAP PRINT SOLUTIONS PVT. LTD's**. operations are those that prohibit the payment or receipt of money, or things of value, in order to receive a commercial benefit or personal advantage. Every country in which we operate, and those we expect to enter in the future, has laws that make the corruption of its public officials a criminal offense. Such behavior, even without a specific law prohibiting it, is a clear violation of **SAP PRINT SOLUTIONS PVT. LTD's**. Code of Business Conduct & Ethics.

This Anti-Bribery Policy was developed at the direction of **SAP PRINT SOLUTIONS PVT. LTD.** Board of Directors to provide clear guidance to you and to ensure a consistent approach to business practices throughout **SAP PRINT SOLUTIONS PVT. LTD.** worldwide operations.

Strict adherence to this Anti-Bribery Policy is absolutely necessary for **SAP PRINT SOLUTIONS PVT. LTD.** to sustain our World Class Service culture. Violations of this Anti-Bribery Policy not only undermine **SAP PRINT SOLUTIONS PVT. LTD.** core values and business purpose and potentially subject **SAP PRINT SOLUTIONS PVT. LTD.** to penalties, but for any individuals involved, could also mean severe criminal penalties, including jail, and will also result in corrective action, including possible termination of employment from **SAP PRINT SOLUTIONS PVT. LTD.**

Every company's officer, associate and agent is responsible for carefully reading and understanding the attached Anti-Bribery Policy and to strictly complying with every aspect of its requirements. Your immediate attention to the attached Policy is appreciated by **SAP PRINT SOLUTIONS PVT. LTD.** Board of Directors and by me personally.

### STATEMENT OF POLICY

**SAP PRINT SOLUTIONS PVT. LTD.** maintains an Anti-Bribery Policy prohibiting any improper or unethical payment to government officials, clients, vendors, suppliers anywhere in the world by any **SAP PRINT SOLUTIONS PVT. LTD.** officer or associate (together, simply "**SAP PRINT SOLUTIONS PVT. LTD.** associates") or agent of **SAP PRINT SOLUTIONS PVT. LTD.** This Anti-Bribery Policy is designed to comply with the requirements of the U.S. Foreign Corrupt Practices Act (the "FCPA"), as well as the anti-bribery laws of those other jurisdictions in which we do business. **SAP PRINT SOLUTIONS PVT. LTD.** Policy states:

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- No **SAP PRINT SOLUTIONS PVT. LTD.** associate or agent has the authority to offer payments of money or anything else of value, whether directly or indirectly, to a government official to induce that official to affect any governmental act or decision in a manner that will assist **SAP PRINT SOLUTIONS PVT. LTD.** or any of its subsidiaries or divisions, or any of its associates or agents, to obtain or retain business.
- Every **SAP PRINT SOLUTIONS PVT. LTD.** associate and agent have the obligation to record accurately and fairly all of their transactions involving any expense of **SAP PRINT SOLUTIONS PVT. LTD.** or any other transaction involving the disposal or transfer of **SAP PRINT SOLUTIONS PVT. LTD.** assets.

The Policy extends to **SAP PRINT SOLUTIONS PVT. LTD.**'s operations anywhere in the world, including all subsidiaries, divisions, agents, consultants or other representatives, as well as to any joint venture or other business enterprise in which **SAP PRINT SOLUTIONS PVT. LTD.** is a participant.

The FCPA specifically prohibits a company from reimbursing an officer, director, stockholder, employee, or agent for fines imposed for violations of the FCPA, so any fines for violations for which you are responsible will be paid from your personal assets. In addition, and in accordance with **SAP PRINT SOLUTIONS PVT. LTD.** general legal compliance policy, **SAP PRINT SOLUTIONS PVT. LTD.** Will cooperate fully with law enforcement authorities in the investigation and prosecution of alleged violations of anti-bribery laws. Prohibited Payments to Government Officials.

No **SAP PRINT SOLUTIONS PVT. LTD.** associate or agent may promise, offer or pay money or give anything else of value to a governmental official in order to:

- influence any act or decision;  
Cause the official to commit or omit any act in violation of his or her lawful duties; secure any improper advantage; or induce the official to use his or her influence to affect any act or decision of a government, in order to assist **SAP PRINT SOLUTIONS PVT. LTD.** (or such associate or agent) in obtaining, retaining or directing business.

In addition to direct payments of money, other examples of prohibited payments to a government official, clients, vendors, suppliers would include:

- excessive gifts, or travel and entertainment expenses for government officials;
- contributions to any political party, campaign or campaign official; and
- Charitable contributions and sponsorships made at the direction, or for the benefit, of a government official. The following persons are considered "government officials":

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- officers and employees of any government, department, agency, bureau, authority, instrumentality or public international organization;
- persons acting in an official capacity on behalf of a government;
- Employees of entities that are owned or controlled by a government; and candidates for political office. Prohibited payments apply to payments to any government official, regardless of rank or position.

### REPORTING VIOLATIONS

Any transaction, no matter how small or seemingly insignificant, that might give rise to a violation of this Policy must be reported promptly by calling the **SAP PRINT SOLUTIONS PVT. LTD.** Your calls, detailed notes and/or emails will be dealt with confidentially and only by those recipients who have a need to know for the sole purpose of carrying out the necessary investigations and follow-up.

As long as a report is made honestly and in good faith, you have the commitment of **SAP PRINT SOLUTIONS PVT. LTD.** And of the Audit Committee of **SAP PRINT SOLUTIONS PVT. LTD.**'s Board of Directors that you will be protected from retaliation and that your rights will be enforced.

A failure to report known or suspected wrongdoing in connection with **SAP PRINT SOLUTIONS PVT. LTD.** business of which a **SAP PRINT SOLUTIONS PVT. LTD.** associate or agent has knowledge may, by itself, subject that individual or entity to disciplinary action, including prosecution under the anti-bribery laws of any jurisdiction.

### ADMINISTRATION POLICY

The Policy will be administered by **SAP PRINT SOLUTIONS PVT. LTD.**'s Anti-Bribery Committee. The Anti-Bribery Committee will report any violations of the Anti-Bribery Policy to the Audit Committee of **SAP PRINT SOLUTIONS PVT. LTD.**'s Board of Directors. The Anti-Bribery Committee will be supported by **SAP PRINT SOLUTIONS PVT. LTD.**'s Corporate Audit, Corporate Finance, and Corporate Legal Departments.

**Further information: Should you have any other questions about the Policy, please contact the SAP PRINT SOLUTIONS PVT. LTD.**

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