



Anti-Bribery & Corruption Policy

1. Policy Statement

Standard Group of Companies (SG) is committed to conducting its business with the highest ethical standards.

SG has a zero-tolerance approach to bribery and corruption and is dedicated to acting professionally, fairly, and with integrity in all business dealings and relationships.

This policy sets out SG's position on bribery and corruption and applies to all employees, directors, officers, agents, consultants, contractors, and any other parties associated with SG.

2. Purpose

The purpose of this policy is to:

- Define what constitutes bribery and corruption.
- Outline the responsibilities of all SG personnel in upholding our anti-bribery and corruption standards.
- Provide guidance on recognizing and preventing corrupt practices.
- Comply with relevant anti-bribery and anti-corruption laws globally, including the UK Bribery Act 2010 and the U.S. Foreign Corrupt Practices Act (FCPA).

3. Scope

This policy applies to:

- All entities and subsidiaries under the Standard Group of Companies.
- All SG employees, contractors, consultants, agents, intermediaries, and third parties acting on SG's behalf, regardless of location.

4. Definitions

- **Bribery:** Offering, promising, giving, accepting, or soliciting anything of value to influence a business outcome or obtain an improper advantage.
- **Corruption:** The abuse of entrusted power for private gain.
- **Facilitation Payments:** Small payments made to expedite routine governmental actions. SG prohibits such payments.
- **Kickbacks:** The return of a portion of money received, often as a result of coercion or a secret agreement, which SG strictly forbids.

5. Prohibited Practices

SG prohibits the following under all circumstances:

- Giving or receiving bribes in any form.
- Offering anything of value (cash, gifts, entertainment, favours) with the intent to improperly influence a decision.
- Making facilitation payments.
- Making political or charitable donations to obtain or retain business.
- Concealing or misrepresenting the true nature of payments in SG's books and records.

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6. Gifts, Hospitality, and Entertainment

Reasonable gifts and hospitality may be accepted or offered only if:

- They are of modest value and appropriate under the circumstances.
- They are not intended to influence any business decision.
- They are properly recorded and disclosed.

Employees must seek prior approval from [Compliance Officer/Line Manager] for any gifts or hospitality exceeding £200 (20,000 INR).

7. Due Diligence and Third Parties

SG requires all third parties acting on its behalf to:

- Undergo appropriate due diligence.
- Agree to comply with SG's Anti-Bribery and Corruption Policy.
- Be monitored regularly for compliance.

Contracts with third parties must include anti-bribery and anti-corruption clauses.

8. Responsibilities

All employees and associated persons are responsible for:

- Understanding and complying with this policy.
- Reporting any suspected or actual bribery or corruption.

Managers must ensure that employees are trained and that controls are in place to prevent corruption.

9. Reporting and Whistleblowing

SG encourages openness and will support anyone who raises concerns in good faith. Reports can be made to:

- Your Line Manager or Compliance Officer – See Below for contact details

All reports will be treated confidentially and investigated thoroughly. Retaliation against whistleblowers is strictly prohibited.

10. Training and Communication

SG will provide regular training and communication on anti-bribery and anti-corruption practices for all relevant employees and third parties.

11. Consequences of Non-Compliance

Violations of this policy may result in:

- Disciplinary action up to and including termination.
- Civil or criminal penalties for individuals or the company.
- Termination of contracts with third parties.

12. Monitoring and Review

This policy will be reviewed annually and updated as needed to reflect changes in legislation or business practices. SG's Compliance Department will monitor adherence and effectiveness.

13. Contact

For any questions or clarifications regarding this policy, please contact:

Compliance Officer (HR Director)

Standard Group of Companies

Siva Prasad

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