

<b>SPARKON TEXTILE VENTURES PRIVATE LIMITED</b>	<b>ANTI BRIBERY POLICY</b>	<b>Formats</b>
<b>Docc.:- STVPL/2025-26/HR/02</b>	<b>Rev. No.:- 05</b>	<b>Rev. Date:- 03/01/2025</b>
<b>Approved By :- Manager</b>	<b>Issued By :- MR</b>	<b>Eff. Date :- 03/01/2024</b>

**1. Policy Statement**

Our factory is committed to conducting business in a fair, honest, and transparent manner. We have zero tolerance for bribery and corruption in any form.

**◆ 2. Definitions**

**Bribery:** Offering, giving, receiving, or soliciting something of value to influence a business decision or official action.

**Facilitation Payments:** Small payments to expedite routine actions — these are strictly prohibited.

**Corruption:** Abuse of entrusted power for personal or corporate gain.

**◆ 3. Prohibited Conduct**

Employees, agents, and third parties must not:

Offer or accept any bribe or improper payment.

Offer gifts, hospitality, or entertainment intended to influence decisions.

Use company funds for unlawful political contributions.

Facilitate any undue benefit from public officials.

**◆ 4. Gifts and Hospitality**

Permitted only if:

Reasonable and modest in value.

Not linked to any contractual decision or favoritism.

Fully disclosed and pre-approved by management.

**◆ 5. Third Parties and Subcontractors**

All vendors, subcontractors, and consultants must:

Commit in writing to abide by this Anti-Bribery Policy.

Undergo due diligence checks.

Avoid facilitating or engaging in bribery on behalf of the company.

**◆ 6. Reporting and Whistleblowing**

Employees are encouraged to report suspicious activities. A confidential mechanism is in place under our Whistleblower Policy.

Retaliation against whistleblowers is strictly prohibited.

<b>PREPARED BY</b>		<b>APPROVED BY</b>
<b>Management Representative</b>		<b>Factory Manager</b>
<i>Manoj</i>		<i>Jayant</i>

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◆ 7. Disciplinary Action

Violations of this policy will lead to disciplinary actions, including termination and legal proceedings under:

Indian Penal Code

Prevention of Corruption Act, 1988

◆ 8. Training and Awareness

Periodic training will be provided to employees and managers to ensure full understanding and compliance.

◆ 9. Recordkeeping

All financial and contractual records must be maintained with accuracy and transparency to demonstrate compliance.

◆ 10. Policy Review

This policy shall be reviewed annually and updated as required to remain compliant with legal and regulatory frameworks.



<b>PREPARED BY</b>	<b>APPROVED BY</b>
<b>Management Representative</b>	<b>Factory Manager</b>
<i>[Signature]</i>	<i>[Signature]</i>