



Anti-Corruption Policy

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ANTI-CORRUPTION POLICY FOR OLINDATA INDIA PRIVATE LIMITED (OPSTEN)

1. Introduction

This Anti-Corruption Policy is established by Olindata India Private Limited, trading as Opsten, to articulate our unwavering commitment to conducting business with integrity, transparency, and in full compliance with all applicable laws and regulations. The purpose of this policy is to provide guidance to all employees, management, and stakeholders on the standards of behavior and practices that uphold our commitment to ethical business conduct. This policy applies to all employees, officers, directors, and any persons or entities acting on behalf of Opsten, in all countries where we operate.

2. Policy Statement

Olindata India Private Limited (Opsten) is committed to conducting its business ethically and in compliance with all applicable anti-corruption laws and regulations, including but not limited to the Prevention of Corruption Act, 1988, and the UK Bribery Act 2010. We define corruption as the abuse of entrusted power for private gain, which includes bribery, extortion, fraud, and other related illegal practices. Opsten strictly prohibits any form of corruption and will take all necessary measures to ensure that its employees, agents, and business partners adhere to this policy in all their dealings.

3. Prohibited Conduct

The following actions are strictly prohibited under this policy: **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence the actions of a public official or any person in a position of trust. **Gifts and Hospitality:** Exchange of gifts or hospitality must be transparent, reasonable, and in compliance with local laws and company guidelines. **Facilitation Payments:** Making unofficial payments to expedite or secure routine government actions is strictly forbidden. **Conflicts of Interest:** Employees must avoid situations where personal interests conflict with the interests of Opsten.

4. Responsibilities

Under this Anti-Corruption Policy, responsibilities are as follows: Employee Responsibilities: All employees are required to understand and comply with this policy, report any suspected corruption, and complete all required training. Management Responsibilities: Management is responsible for implementing and enforcing this policy, providing necessary training, and ensuring a culture of integrity and compliance.

5. Reporting And Whistleblowing

Opsten encourages a culture where ethical concerns can be raised without fear of retaliation. Employees are urged to report any suspected corruption or violation of this policy through established channels. The company ensures confidentiality and protection for whistleblowers against any form of retaliation or adverse employment consequences as a result of reporting in good faith.

6. Training And Communication

Opsten is committed to regular training programs for all employees to ensure they are aware of their responsibilities under this policy. The policy will be communicated across the organization through internal channels and made available to all employees. Regular updates and refreshers will be provided to ensure ongoing awareness and compliance.

7. Monitoring And Enforcement

Opsten will conduct regular audits and reviews to ensure compliance with this Anti-Corruption Policy. Any violations of the policy will be dealt with promptly, and may result in disciplinary action, up to and including termination of employment. The company is committed to maintaining a zero-tolerance approach to corruption in all its forms.

8. Policy Review And Amendments

This policy will be reviewed periodically to ensure its effectiveness and relevance. Amendments may be made to reflect changes in laws, regulations, and best practices. All employees will be notified of any changes to the policy, and updated training will be provided as necessary.



9. Conclusion

Olindata India Private Limited (Opsten) is committed to upholding the highest standards of ethical conduct and integrity in all its business dealings. This Anti-Corruption Policy is a testament to our dedication to preventing corruption and ensuring a fair and transparent business environment. We expect all employees, management, and business partners to adhere to this policy and contribute to our culture of honesty and accountability.