

# ANTI-BRIBERY AND EQUAL OPPORTUNITY POLICY



Version	Approved by	Approved On	Effective From
Version 1.0	Board of Directors	May 13, 2021	May 13, 2021
Version 2.0	Board of Directors	February 12, 2025	February 12, 2025

## ANTI-BRIBERY AND EQUAL OPPORTUNITY POLICY

### 1. INTRODUCTION

Krsnaa Diagnostics Limited ("**Company**") is committed to conduct its business in accordance with the applicable laws, rules and regulations in all geographical regions having the operation of the Company, with the highest standards of integrity and business ethics.

### 2. PURPOSE

The Purpose for setting out this Policy is to ensure that adequate guidelines are put in place to prevent any incident relating to bribery, corruption, and any forms thereof within or in relation to the Company. The Company expects every person associated with it and coming within the scope of this Policy, to adhere to terms laid down within its contents and act in accordance with the principles outlined herein.

### 3. SCOPE

This Anti Bribery and Anti-Corruption Policy is applicable to all the employees, trainees/interns, contract workmen, vendors, customers, auditors, directors, visitors, including regulatory and government authorities (collectively called as "Personnel"), of the Company & its subsidiaries.

### 4. ANTI-BRIBERY AND CORRUPTION

- I. **Prohibition of Bribery:** The Company strictly prohibits offering, giving, soliciting, or accepting any form of bribe, kickback, or facilitation payment, whether directly or indirectly, to gain an improper business advantage.
- II. **Facilitation Payments:** Facilitation payments, also known as "grease payments," are strictly prohibited. These are small payments made to expedite routine government actions or services that an organization is already entitled to receive.
- III. **Gifts, Hospitality, and Entertainment:** Gifts, hospitality, or entertainment given or received in the normal course of business must be reasonable, modest, and comply with applicable laws and regulations. Any gift or hospitality that could be perceived as influencing a business decision is strictly prohibited.
- IV. **Charitable Contributions and Sponsorships:** All charitable contributions and sponsorships must be transparent, legal, and made with the intention of promoting a genuine charitable purpose rather than obtaining an improper business advantage.

## 5. EQUAL OPPORTUNITY

- I. **Non-Discrimination:** The Company promotes a diverse and inclusive workplace and strictly prohibits discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, or any other protected characteristic.
- II. **Equal Employment Opportunity:** All employment-related decisions, including recruitment, hiring, promotions, training, compensation, and benefits, must be based on merit, qualifications, and relevant experience without regard to any protected characteristic.
- III. **Harassment and Bullying:** Harassment or bullying of any form, including but not limited to verbal, physical, or written abuse, is strictly prohibited. This includes harassment or bullying based on any protected characteristic.
- IV. **Confidentiality:**
  - a) All employees and candidates have the right to disclose their gender, gender identity, disability status, HIV/AIDS status, etc. or keep such information private.
  - b) Any employee desiring to change their name, gender or disability status or any information relating to their medical health in the official records of the Company should contact the Human Resources team.
  - c) All such information collected by the Company (as identified in point (a) above) from in relation to their protected characteristics will be kept confidential and will be used in accordance with applicable laws and subject to applicable law.

## 6. REPORTING AND COMPLIANCE

- i. **Reporting Violations:** Employees, contractors, suppliers, and business partners are encouraged to report any suspected or actual violations of this policy through the designated reporting channels. Whistleblower protection will be provided to those reporting in good faith.
- ii. **Investigation and Disciplinary Action:** All reported violations will be promptly and thoroughly investigated. Any individual found to have violated this policy will be subject to appropriate disciplinary action, which may include termination of employment or contract, as well as legal action where applicable.
- iii. **Legal Compliance:** The Company will comply with all applicable anti-bribery, corruption, and equal opportunity laws and regulations in the jurisdictions where it operates.

## 7. ANTI- MONEY LAUNDERING

Money laundering occurs when someone directly or indirectly gets involved in any activity connected with the proceeds of a crime including its concealment, possession, acquisition or use and projecting

or claiming it as untainted property. The Company strictly prohibits all personnel covered under this Policy to undertake any such act whether in person or professional capacity, which may count as a money laundering activity.

## 8. AMENDMENTS

The Company is dedicated to regularly assess and update its policies and procedures. Consequently, this policy may be amended from time to time subject to Board approval and in compliance with applicable laws and regulations. This policy and any further modifications/ amendments to the same shall be promptly disclosed on the Company's website and filed in accordance with the applicable laws and regulations.

*In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc., shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the Effective Date as laid down under such amendment(s), clarification(s), circular(s) etc.*

