

Steelman Telecom Limited

(Formerly known as Steelman Telecom Private Limited)

Anti-Corruption Policy

1. Introduction

Steelman Telecom Limited is committed to conducting business ethically and with integrity. This Anti-Corruption Policy outlines the Company's commitment to preventing and detecting corruption and bribery in all its business activities.

2. Policy Statement

Steelman Telecom Limited has a zero-tolerance policy towards corruption and bribery. The Company will not tolerate any form of corruption, including bribery, extortion, fraud, and embezzlement.

Scope

This policy applies to all employees, directors, officers, agents, and representatives of the Company, as well as third parties acting on behalf of the Company.

3. Key Principles

3.1 Compliance with Laws and Regulations: The Company will comply with all applicable anti-corruption laws and regulations, including the Foreign Corrupt Practices Act (FCPA) and Prevention of Corruption Act, 1988 under constitution of India.

3.2 Due Diligence: The Company will conduct thorough due diligence on all business partners, suppliers, and agents to mitigate corruption risks.

3.4 Transparency and Accountability: The Company will maintain transparent and accountable business practices, including accurate record-keeping and financial reporting.

3.5 Gifts and Hospitality: The Company will limit the acceptance and giving of gifts and hospitality to reasonable levels and in accordance with applicable laws and regulations.

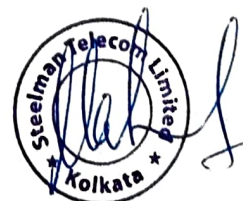
3.6 Political Contributions: The Company will not make political contributions that could be construed as bribery or corruption.

3.7 Whistleblower Protection: The Company will protect employees who report suspected corruption or bribery in good faith.

4 Prohibited Conduct

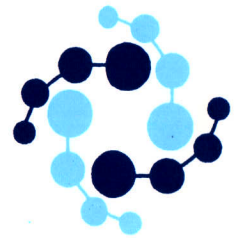
The following conduct is strictly prohibited:

- Offering, promising, giving, or authorizing any bribe or other improper payment to any person, directly or indirectly.



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- Soliciting, accepting, or receiving any bribe or other improper payment from any person, directly or indirectly.
- Misappropriation of Company funds or assets.
- Falsification of records or documents.
- Engaging in fraudulent or deceptive practices.
- Abuse of position or authority for personal gain.

5. Training and Awareness

The Company will provide regular training and awareness programs to all employees on the Company's anti-corruption policy and procedures.

6. Reporting and Investigation

The Company will establish a confidential reporting mechanism for employees to report suspected corruption or bribery. All reports will be investigated promptly and impartially.

6.1 Reporting: Employees are encouraged to report any suspected violations of this policy to their supervisor, HR, or the appropriate ethics hotline at compliance@steelmantelecom.com

7. Disciplinary Action

The Company will take appropriate disciplinary action against any employee who violates this policy, up to and including termination of employment.

8. Review and Update

The Company will review and update this policy periodically to ensure its continued effectiveness.

By adhering to this Anti-Corruption Policy, **Steelman Telecom Limited** aims to maintain the highest standards of ethical conduct and build a strong reputation for integrity.

By The Order of the Board
For Steelman Telecom Limited

Steelman Telecom Limited

Mahendra Bindal

(Managing Director)

DIN: 00484964