


**Kewaunee Labway Private Limited**  
**Anti-Bribery and Corruption (ABAC) Policy**

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<b>Reviewed by (VP- Finance, Treasury and Compliance)</b>	<i>Rani Tibrewal</i>
<b>Approved by (Managing Director)</b>	

## 1.0 Introduction

Kewaunee Labway India Private Limited (“Kewaunee” or “the Company”) is committed to conducting all its business activities with the highest standards of integrity, transparency and ethical conduct. As a leader in laboratory infrastructure solutions, our reputation is built on fairness, trust and responsible business practices.

The Company adopts a zero-tolerance approach to bribery and corruption in any form. This Anti-Bribery and Corruption (ABAC) Policy establishes the principles, requirements and controls to prevent, detect and address bribery and corruption risks in line with applicable laws and internationally recognized standards.

## 2.0 Scope

This Policy applies to all directors, officers, employees (permanent, temporary or contractual) and to all business associates acting on behalf of or representing the Company, including agents, distributors, contractors, consultants, suppliers and other third parties.

The Policy covers all business activities and transactions, including interactions with public officials and private entities, procurement processes, regulatory engagements, sales, marketing, licensing, approvals and all domestic and international operations.

## 3.0 Commitment

Kewaunee Labway India Private Limited commits to:

- Complying with all applicable anti-bribery and anti-corruption laws, including the Prevention of Corruption Act, 1988 (India).
- Establishing, implementing and maintaining an Anti-Bribery Management System (ABMS).
- Prohibiting all forms of bribery, corruption, facilitation payments and improper advantages.
- Encouraging good faith reporting of concerns without fear of retaliation.
- Continually improving the effectiveness of the ABMS to address evolving risks and regulatory expectations.

## 4.0 Definitions

- Anti-Bribery Management System (ABMS): A management system designed to prevent, detect and respond to bribery, and to comply with anti-bribery laws and voluntary commitments, in alignment with ISO 37001.
- Bribery: The offering, promising, giving, accepting or soliciting of an undue advantage, whether financial or non-financial, directly or indirectly, to influence the performance of a duty or obligation.
- Corruption: The abuse of entrusted power for private gain, including bribery, extortion, fraud, facilitation payments, nepotism and conflicts of interest.
- Undue Advantage: Any benefit to which a person is not lawfully entitled, including money, gifts, hospitality, employment, services, discounts, loans, travel, favors or preferential treatment.
- Public Official: Any individual holding a legislative, administrative or judicial position, whether appointed or elected, including employees of government departments, regulatory authorities, state-owned or state-controlled entities, public international organizations and political parties.
- Business Associate (Third Party): Any individual or entity that performs services for, or on behalf of, the Company, including agents, distributors, consultants, intermediaries, contractors, suppliers, joint venture partners and representatives.
- Facilitation Payment: A small, unofficial payment made to secure or expedite routine governmental actions, such as permits, clearances or utility connections. Facilitation payments are prohibited under this Policy.
- Conflict of Interest: A situation where personal, financial or family interests interfere, or appear to

interfere, with an individual's ability to act objectively and in the best interests of the Company.

- Gift: Any item, service, benefit or favor offered or received without direct payment, including cash equivalents, vouchers, promotional items or personal favors.
- Hospitality: Meals, entertainment, travel, accommodation or other business courtesies provided or received in connection with business activities.
- Donation: Any voluntary contribution of money, goods or services to charitable, social or community organizations.
- Political Contribution: Any direct or indirect contribution made to a political party, candidate or political organization, including financial support or provision of services.
- Due Diligence: A risk-based process of evaluating the integrity, reputation, ownership, control structure and compliance history of a business associate or individual prior to engagement and during the course of the relationship.
- High-Risk Position: A role that involves significant interaction with public officials, high-value transactions, procurement, licensing, regulatory approvals or third-party management.
- Whistleblower: Any person who reports, in good faith, suspected bribery, corruption or violations of this Policy through approved reporting channels.
- Retaliation: Any adverse action taken against a person for reporting concerns in good faith, including dismissal, demotion, harassment, discrimination or intimidation.
- Top Management: The person or group of people who direct and control the Company at the highest level, including the Managing Director and Board of Directors.

#### **5.0 Bribery Risk Assessment**

We endeavour to conduct bribery risk assessments at least once a year or when there are any major changes in the organization (e.g., new markets, mergers). Risk assessments shall include factors such as country risk, sector risk, transaction value, nature of engagements and reliance on third parties. The results would further inform the design of internal controls, due diligence requirements and mitigation measures.

#### **6.0 Prohibited Conduct & Rules**

The following conduct is strictly prohibited:

- Bribery: No employee or business associate shall offer, promise, give, accept or solicit any bribe, kickback or improper advantage.
- Facilitation Payments: Facilitation payments are not permitted under any circumstances.
- Political and Charitable Contributions: Contributions must not be used to influence business decisions. Any permitted donations must be lawful, transparent and pre-approved by the Compliance function.
- Books and Records: All transactions must be accurately recorded. False, misleading or off-the-books entries are prohibited.
- Conflicts of Interest: Actual or potential conflicts must be disclosed to HR or Compliance and managed appropriately.

#### **7.0 Gifts, Hospitality and Donations.**

We do not accept gifts and hospitality that might be considered as bribery.

- Gifts to public officials are generally prohibited. Any ceremonial items of nominal value require prior Compliance approval.
- Hospitality must be modest, directly related to a legitimate business purpose and properly documented.
- Gifts and hospitality above stipulated thresholds must be recorded in the Gifts and Hospitality Register.

#### **8.0 Operational Controls and Due Diligence.**

We apply controls in the proportion to the level of risk:

- Due Diligence: Before engaging with business partners (agents, subcontractors) or job applicants to high-risk positions, we evaluate their integrity and reputation. Due diligence is updated on a regular basis.
- Financial Controls: We implement segregation of duties (separate initiator/approver), limited payments authority levels, and tight restrictions on cash transactions.
- Non-Financial Controls: We procure through pre-qualified vendors, major contracts must be bid to at

least 3 vendors, and we must have evidence of service before paying.

### **9.0 Whistleblowing, Investigations and Remediation.**

Kewaunee maintains confidential reporting channels, including a hotline and designated email, for reporting suspected bribery or ABMS weaknesses. Retaliation against good-faith reporters is strictly prohibited.

### **10.0 Investigations & Discipline:**

Reports are all researched without bias by the Compliance Function or independent investigators. The proven violations may result in disciplinary action, including termination and legal proceedings. Root-cause analyses and corrective actions are implemented to prevent recurrence.

### **11.0 Training, Communication and Employment.**

- Training: Mandatory anti-bribery training is provided at induction and annually thereafter, with enhanced training for high-risk roles.
- Communication: This Policy is communicated to employees and relevant business associates.
- Employment Practices: Employment contracts include compliance clauses. Declarations and incentive structures are reviewed to avoid encouraging unethical conduct.

### **12.0 Oversight & Improvement**

To measure the performance, we:

- Key Performance Indicators (KPIs): Monitor indicators as training completion rates, the percentage of high-risk partners screened, hotline calls, and the time it takes to close an investigation.
- Internal Audit: Perform risk-based internal audits on a regular basis.
- Management Review: Top Management will review the policy on an annual basis to determine its appropriateness and performance based on the audit results and changes in risks and use them to make decisions on how to improve it.

We will ensure that we continuously improve and will revise this policy and our controls as risks and regulations change.