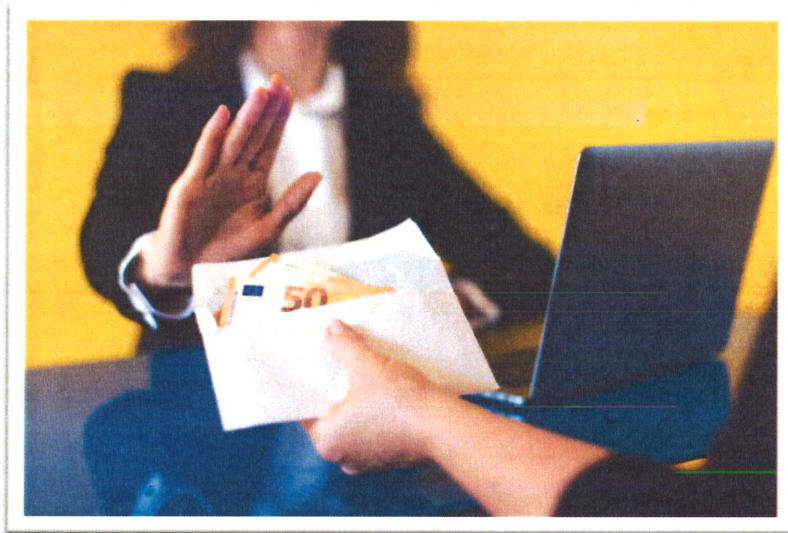


# Solon India Private Limited



## **Anti-Fraud & Anti-Corruption Compliance Program**

**September 2023**

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## List of Acronyms

SIPL	SOLON India Pvt Ltd
EPC	Engineering Procurement Construction
FCPA	Foreign Corrupt Practices Act
UNCAC	United Nations Convention against Corruption
OECD	Organization for Economic Co-operation and Development

## 1. Introduction

Fraud and corruption pose significant threats to the integrity and reputation of Solon India Private Limited (SIPL). As a responsible and ethically driven organization, we are committed to upholding the highest standards of honesty, transparency, and accountability in all our



business activities. This Anti-Fraud and Anti-Corruption Policy serves as a cornerstone of our dedication to fostering an environment of integrity, preventing fraudulent activities, and eradicating corruption from our operations. By adhering to the principles outlined in this policy, we aim to protect our stakeholders, maintain trust in our brand, and contribute to the overall well-being of the solar industry.

### 1.1 Purpose of the Policy

The purpose of this policy is to establish a comprehensive framework for preventing, detecting, and addressing fraud and corruption within SIPL. This policy outlines the principles, expectations, and guidelines that all employees, contractors, partners, and stakeholders must adhere to in order to maintain the highest ethical standards. By defining acceptable conduct and behaviors, providing guidance on risk mitigation, and offering clear reporting channels, this policy aims to minimize the vulnerabilities that could potentially lead to fraudulent or corrupt activities. Furthermore, this policy underscores our commitment to compliance with relevant laws, regulations, and international anti-corruption conventions, affirming our dedication to lawful and ethical business practices.

### 1.2 Scope

This Anti-Fraud and Anti-Corruption Policy applies to every individual associated with SIPL, including but not limited to employees, contractors, suppliers, partners, agents, and consultants. The policy encompasses all aspects of our operations, including procurement, project execution, financial management, interactions with government entities, and engagement with third parties. Regardless of position or role, everyone is expected to familiarize themselves with this policy, understand its implications, and integrate its principles into their daily activities. This policy extends to all geographic regions where our company operates, recognizing the global nature of anti-fraud and anti-corruption efforts.

### 1.3 Policy Statement

Our company's leadership is unwavering in its commitment to maintaining a work environment characterized by integrity, transparency, and ethical conduct. Through this policy, we seek to ensure that Solon India Private Limited's operations reflect the highest ethical values and contribute positively to the industry and the communities we serve.

## 2. Legal and Regulatory Framework

The solar EPC industry operates within a complex legal and regulatory landscape that necessitates a comprehensive understanding of anti-fraud and anti-corruption measures. At our company, we recognize the critical importance of adhering to these laws and regulations to maintain the highest standards of integrity and ethical conduct. This section of the policy provides a concise overview of the key legal and regulatory frameworks that govern anti-fraud and anti-corruption efforts within our industry. By staying informed about these regulations, we can effectively tailor our internal policies and procedures to ensure compliance and contribute to a culture of transparency and accountability.



## 2.1 Overview of Relevant Laws and Regulations

Our commitment to combatting fraud and corruption extends to strict adherence to relevant national and international laws and regulations. These encompass laws related to bribery, corruption, money laundering, fraud, and other illicit practices. In particular, we emphasize compliance with laws such as the Prevention of Money Laundering Act (PMLA), Foreign Exchange Management Act (FEMA) and the various anti-corruption laws and regulations that pertain to the jurisdictions in which we operate. Understanding these regulations and their implications is crucial for all employees and stakeholders to ensure that our business practices remain beyond reproach.

## 2.3 Applicability to the Solar EPC Industry

This policy underscores the industry-specific risks associated with our operations and outlines tailored strategies to mitigate these risks effectively. By addressing the industry's challenges head-on, we aim to fortify our company against fraud and corruption while also contributing to the overall credibility and sustainability of the solar energy sector.

## 3. Definitions

This section provides a list of key terminology and concepts used throughout the policy.

### 3.1 Key Terminology and Concepts

**Fraud:** The intentional deception or misrepresentation of facts, data, or information to gain an unfair advantage or financial benefit, causing harm to the company, its stakeholders, or third parties.

**Corruption:** The abuse of entrusted power for personal or organizational gain, typically involving bribery, extortion, influence peddling, nepotism, or other unethical practices.

**Bribery:** The act of offering, giving, receiving, or soliciting something of value to influence the actions, decisions, or behavior of an individual or entity in a position of power, usually in violation of laws or ethical standards.

**Conflict of Interest:** A situation in which an individual's personal, financial, or other interests may compromise their objectivity, impartiality, or decision-making in a professional capacity.

**Whistleblower:** An individual who reports suspected fraudulent or corrupt activities within the company, often through designated channels, with protection against retaliation.

**Due Diligence:** The process of thorough research and investigation conducted before entering into business relationships, transactions, or partnerships to ensure compliance with legal and ethical standards.

**Kickback:** An illicit payment made to an individual, often a decision-maker or influencer, in exchange for securing a contract, deal, or business advantage.

**Transparency:** The practice of openly sharing information, processes, and decisions to ensure clarity, accountability, and trust among stakeholders.

**Gifts, Entertainment, and Hospitality:** Items, services, or experiences provided to individuals by the company or its associates that may influence their decisions, and thus need to be managed transparently and ethically.

**Accounting Irregularities:** Deliberate manipulation or misrepresentation of financial information to deceive stakeholders, regulators, or investors.

**Beneficial Ownership:** The identification of individuals who ultimately own, control, or benefit from a company, often used to prevent money laundering and corruption.

**Compliance:** Adherence to internal policies, external regulations, and ethical standards to ensure that all actions and decisions are aligned with legal and moral principles.

Defining these terms fosters a shared understanding of the concepts that underpin our Anti-Fraud and Anti-Corruption Policy. By using consistent language and interpretations, we bolster our ability to prevent and address fraudulent and corrupt behaviors effectively, maintaining the integrity of Solon India Private Limited's operations.

## 4. Commitment to Anti-Fraud and Anti-Corruption

This section of the policy underscores our dedication to maintaining the highest ethical standards in all our endeavors. By communicating this commitment to all stakeholders, we lay the foundation for a culture that values honest conduct, open communication, and principled decision-making.

### 4.1 Top Management's Commitment

Top management is responsible for setting the tone of the organization and creating an environment in which all employees are empowered to make ethical choices without fear of retribution.

### 4.2 Employee Responsibilities

From the moment of onboarding, all employees are educated about the importance of ethical conduct, trained on recognizing potential risks, and guided on the steps to take when faced with a dilemma. Every employee, regardless of role or level, is expected to integrate these principles into their daily activities. This includes ensuring transparent and accurate record-keeping, conducting due diligence on third parties, reporting suspicious activities, and avoiding any actions that might compromise our ethical standing.

### 4.3 Zero-Tolerance Approach

Our commitment to combating fraud and corruption is unambiguous: we maintain a zero-tolerance approach to any form of unethical behavior. This policy serves as a clear mandate

that fraudulent and corrupt actions will not be tolerated under any circumstances. Violations of this policy will result in disciplinary actions, including but not limited to termination of employment, legal actions, and reporting to relevant authorities.

## 5. Risk Assessment and Management

This section of the policy outlines our commitment to conducting thorough risk assessments, using effective methods to evaluate potential threats, and implementing strategies to mitigate these risks. By addressing vulnerabilities preemptively, we strengthen our capacity to prevent fraudulent and corrupt activities and safeguard our reputation as a responsible industry leader.

### 5.1 Risk Assessment Methods

Our employees, equipped with training and guidance, are encouraged to report any suspicious activities or situations that may indicate potential fraudulent or corrupt behaviours. SIPL continuously monitoring to identify unusual patterns and potential red flags and regularly review financial statements, transactions, and audit trails to detect anomalies.

### 5.2 Mitigation Strategies

Depending on the case, we develop a protocol for investigating suspected fraud incidents and assign a designated team or individual responsible for conducting thorough investigations and maintaining records of all investigations and outcomes.

In instances where risks are identified, we swiftly deploy responsive measures to mitigate potential harm. By employing these strategies, we aim to create an environment where fraudulent and corrupt activities find no foothold, preserving the trust of our stakeholders and reinforcing the ethical foundation of Solon India Private Limited.

## 6. Code of Conduct and Ethics

This section of the policy emphasizes our commitment to fostering a culture of integrity, transparency, and ethical decision-making. It sets forth a comprehensive framework that guides employees, contractors, partners, and stakeholders in their interactions and activities. By adhering to these standards, we create a robust ethical foundation that deters fraudulent and corrupt behaviors while upholding the reputation and credibility of our company within the solar EPC industry.

### 6.1 Expected Standards of Behaviour

Our Code of Conduct establishes clear expectations for behavior aligned with the highest ethical standards. It encompasses honesty, fairness, accountability, and respect in all interactions, both internal and external. This includes compliance with laws, regulations, and company policies, as well as the obligation to report any violations or concerns.



## 6.2 Conflicts of Interest

Employees and stakeholders are expected to act in the best interests of the company and avoid situations where personal, financial, or other interests might conflict with their responsibilities. Through transparent disclosure and careful management, we ensure that our actions are guided by the highest ethical considerations, fostering trust and accountability.

## 6.3 Gifts, Entertainment, and Hospitality

Our commitment to transparency extends to interactions involving gifts, entertainment, and hospitality. Employees and stakeholders are required to exercise prudence and adhere to pre-defined limits, reporting instances that exceed these thresholds. By maintaining a transparent approach to these interactions, we uphold the integrity of our business relationships and prevent potential conflicts of interest.

## 6.4 Whistleblower Protection

To ensure that individuals can report concerns without fear of retaliation, our policy includes robust whistleblower protection measures. We recognize the importance of fostering an environment where concerns can be raised without repercussions, and we are committed to investigating reported issues thoroughly and taking appropriate action. By prioritizing whistleblower protection, we create a culture that encourages accountability and the early detection of potential fraudulent or corrupt activities, reinforcing our commitment to ethical conduct within SIPL.

# 7. Third-Party Due Diligence

Given the interconnected nature of our operations and the potential risks posed by external parties, our Anti-Fraud and Anti-Corruption Policy places a strong emphasis on rigorous third-party due diligence when required. This essential section highlights our commitment to ensuring that vendors, suppliers, partners, and contractors share our values and commitment to ethical conduct. By conducting thorough due diligence, we reduce the likelihood of engaging with entities that may expose us to fraudulent or corrupt activities, safeguarding our reputation, and protecting our stakeholders' interests.

## 7.1 Vendor and Supplier Screening

We conduct comprehensive checks to assess the reputation, financial stability, and compliance history of potential vendors and suppliers. This process helps identify any potential red flags, such as prior instances of fraud or corruption. By engaging with partners who share our commitment to ethical business practices, we create a mutually beneficial ecosystem that reinforces our industry's integrity.

## 7.2 Partner and Contractor Evaluation

This policy section emphasizes the need for a systematic evaluation of partners' and contractors' credentials, track record, and adherence to anti-fraud and anti-corruption principles. Evaluations take into account factors such as their internal controls, conflict of interest policies, and anti-corruption programs.

## 7.3 Anti-Corruption Clauses in Contracts

This section of the policy mandates the inclusion of anti-corruption clauses in all agreements with third parties. These clauses affirm our stance against bribery, kickbacks, and other corrupt practices, making it clear that compliance with ethical standards is a non-negotiable requirement for doing business with our company. These contractual provisions also provide us with legal recourse in the event of breach, reinforcing our commitment to maintaining a clean and transparent business environment.

# 8. Financial Controls and Transparency

This section underscores our unwavering commitment to transparent and ethical financial operations. By implementing robust financial controls, adhering to stringent accounting practices, and maintaining transparency in our financial reporting, we ensure that our company's fiscal activities align with our values. These practices not only enhance the credibility of our financial statements but also safeguard against potential fraudulent or corrupt activities that could compromise our reputation and the trust of our stakeholders.

## 8.1 Accounting Practices

This policy section emphasizes the importance of proper documentation, honest reporting, and adherence to generally accepted accounting principles. We hold our finance and accounting teams accountable for the accuracy of financial data, discouraging any attempts to manipulate or misrepresent financial information for personal or corporate gain.

## 8.2 Expense Reporting and Approval

This policy section outlines the procedures for reporting and approving expenses, emphasizing the importance of accuracy, accountability, and adherence to established spending limits. All employees are required to follow these procedures, ensuring that expenditures are properly documented and reviewed. This practice not only promotes fiscal responsibility but also deters fraudulent activities, such as submitting falsified or inflated expense claims.

## 8.3 Donations and Contributions

Transparent reporting of such contributions is mandatory, ensuring that our financial activities remain open to scrutiny. By approaching donations and contributions with the same

level of transparency and accountability as our other financial operations, we maintain the highest ethical standards in all aspects of our business.

## 9. Procurement Integrity

This section of the policy underscores our commitment to fair, transparent, and ethical procurement practices. By implementing robust processes that prevent bid rigging, ensure diversity and inclusion among suppliers, and foster a culture of accountability, we not only protect our company from fraudulent and corrupt activities but also contribute to a healthy, competitive, and responsible procurement environment in the solar EPC industry.

### 9.1 Fair and Transparent Procurement Processes

It mandates the inclusion of ethical considerations in supplier selection, emphasizing that decisions should be based on merit, quality, and value rather than any undue influence or improper incentives.

### 9.2 Bid Rigging Prevention

We emphasize that our company strictly prohibits any form of anti-competitive behavior, including bid suppression, price fixing, and market allocation. By actively monitoring bid processes, encouraging healthy competition, and reporting any suspicious activities, we maintain a procurement environment that promotes efficiency, innovation, and fairness.

### 9.3 Supplier Diversity and Inclusion

We believe that supplier diversity not only contributes to a vibrant and competitive marketplace but also mitigates the risk of corruption by reducing dependency on a limited number of suppliers.

## 10. Project Execution and Oversight

By implementing robust monitoring practices, preventing kickbacks and bribery, and prioritizing quality assurance and compliance, we ensure that our projects contribute to the industry's reputation for reliability, integrity, and professionalism.

### 10.1 Project Monitoring and Reporting

Project managers are tasked with regular reporting, ensuring transparency in project activities and expenditure patterns. Additionally, employees are encouraged to report any suspicious behaviors or discrepancies they observe during project execution.

### 10.2 Prevention of Kickbacks and Bribery

We unequivocally prohibit the solicitation or acceptance of kickbacks, bribes, or other forms of improper incentives. Employees are expected to refuse any offers that might compromise



their objectivity or decision-making. Through regular training, clear communication, and stringent internal controls, we establish a framework that discourages such behaviors and empowers employees to make ethical choices even when faced with external pressures.

### 10.3 Quality Assurance and Compliance

Rigorous quality checks, regular audits, and adherence to relevant standards are integral to our approach. By prioritizing quality assurance and compliance, we safeguard against fraudulent activities and contribute to projects that meet the highest industry standards. By promoting a culture that values integrity and diligence, we contribute to the solar EPC industry's reputation for delivering reliable and responsible projects.

## 11. Training and Awareness

This section underscores our commitment to continuous learning, emphasizing the importance of ongoing training and awareness programs. By providing employees with the tools to recognize potential risks, report concerns, and make ethical decisions, we foster a workforce that is proactive in upholding our values and maintaining the integrity of our operations.

### 11.1 Employee Training Programs

This policy section outlines our commitment to offering tailored training sessions that cover the policy's principles, industry-specific risks, and best practices for ethical conduct. New employees undergo onboarding training, which familiarizes them with our Anti-Fraud and Anti-Corruption Policy, while all employees participate in annual refresher sessions to ensure that everyone remains up to date with the latest developments in ethical business practices.

### 11.3 Communication Channels for Queries

We provide multiple avenues, including dedicated email addresses, anonymous reporting mechanisms, and designated individuals who can address queries. By making it easy for employees to seek clarifications or report suspicions, we create an environment that encourages the early detection and prevention of fraudulent or corrupt activities.

## 12. Reporting and Investigation

By creating a safe environment for reporting and addressing potential issues, we empower individuals at all levels of Solon India Private Limited to actively participate in maintaining the integrity of our operations.

### 12.1 Reporting Suspicious Activities

Suspicious activities can range from questionable financial transactions to unusual behavior or conflicts of interest. By providing clear guidance on how to report concerns, we aim to

uncover potential risks early and prevent any harm to our company's reputation or operations.

#### 12.2 Internal and External Reporting Mechanisms

By offering multiple reporting options, we ensure that individuals can choose the avenue that they are most comfortable with, thereby facilitating the early detection and resolution of potential fraudulent or corrupt activities.

### 13. Enforcement and Disciplinary Actions

By establishing clear consequences for non-compliance, we reinforce the importance of ethical behavior within Solon India Private Limited and foster a culture of responsibility and respect for our values.

#### 13.1 Consequences for Policy Violations

This policy section outlines the range of potential consequences, which may include verbal or written warnings, suspension, termination of employment or contracts, and even legal actions. The severity of the consequences will depend on factors such as the nature of the violation, its impact on the company and stakeholders, and the individual's role and level of responsibility.

#### 13.2 Legal Actions and Cooperation with Authorities

We ensure that disciplinary actions are taken based on objective assessments, without bias or favoritism. By taking legal actions when necessary, we demonstrate our unwavering commitment to upholding the rule of law and contributing to a business environment characterized by honesty, transparency, and accountability.

### 14. Continuous Improvement

By actively seeking opportunities to refine our approach, we reinforce our dedication to maintaining the highest standards of ethical conduct within Solon India Private Limited.

#### 14.1 Policy Review and Updates

We involve relevant stakeholders in these reviews to ensure a comprehensive assessment of potential areas for improvement. Any necessary updates to the policy will be communicated transparently to all employees and stakeholders, keeping them informed of the latest changes and expectations.

#### 14.2 Learning from Incidents

This policy section emphasizes our dedication to analyzing and learning from any reported incidents or violations of the policy. Instead of viewing incidents solely as setbacks, we

approach them as opportunities to strengthen our policies, controls, and training programs. By identifying the root causes of incidents and addressing them proactively, we not only prevent similar occurrences in the future but also demonstrate our commitment to continuous improvement and ethical growth.

#### 14.3 Benchmarking Best Practices

To stay at the forefront of anti-fraud and anti-corruption efforts, we actively benchmark our practices against industry best standards and emerging trends. This policy section highlights our commitment to learning from the experiences of other organizations and industries, adopting proven strategies, and implementing innovative approaches to fraud and corruption prevention. By leveraging these insights, we remain agile in our approach and position ourselves to address new and evolving challenges effectively.

### 15. Conclusion

The Anti-Fraud and Anti-Corruption Policy serves as our unwavering pledge to uphold the highest standards of ethical conduct within Solon India Private Limited. This policy encompasses a comprehensive framework designed to prevent, detect, and address fraudulent and corrupt activities at all levels of our operations. By embedding these principles into our daily practices, we reaffirm our commitment to integrity, transparency, and accountability.

As we conclude, we emphasize that every individual associated with our company shares the responsibility of upholding the principles set forth in this policy.





## Appendix A: Relevant Laws and Regulations

This appendix provides an overview of key laws and regulations that are relevant to Solon India Private Limited's Anti-Fraud and Anti-Corruption Policy. These legal frameworks serve as a foundation for our commitment to ethical behavior, transparency, and accountability within our company. It is important to note that this list is not exhaustive and may evolve over time with changes in legislation.

### 2. The United Nations Convention against Corruption (UNCAC)

UNCAC is a global anti-corruption treaty that addresses various forms of corruption, including bribery, embezzlement, and abuse of power. Our company recognizes its commitment to the principles of UNCAC and endeavors to align our practices with its provisions.

### 3. Local Anti-Corruption and Anti-Fraud Laws

In addition to international conventions, it is essential to adhere to local laws and regulations specific to the regions where we operate. These laws may include anti-corruption acts, fraud statutes, and regulations related to reporting suspicious activities.

Prevention of Money Laundering Act, 2002

**Companies Act, 2013:** Includes provisions for corporate fraud, including those related to the conduct of company directors and officers.

**The Negotiable Instruments Act, 1881:** Deals with cases of dishonor of cheques, a common form of financial fraud.

### 4. Industry-Specific Regulations

Given the nature of our business, industry-specific regulations and codes of conduct may apply. These could include regulations related to environmental compliance, safety, and project management.

It is the responsibility of every employee, contractor, partner, and stakeholder associated with our company to familiarize themselves with these laws and regulations and to conduct themselves in a manner consistent with their principles. Non-compliance can have serious legal and reputational consequences for our company. If you have questions or concerns regarding the application of these laws and regulations to our operations, please consult the appropriate legal or compliance personnel.

## Appendix B: Whistleblower Reporting Form

This form is intended to facilitate the reporting of suspicious activities, potential violations of Solon India Private Limited's Anti-Fraud and Anti-Corruption Policy, or any other unethical behavior. We encourage all employees, contractors, partners, and stakeholders to use this form to report concerns anonymously if preferred. Your willingness to come forward with information is crucial in maintaining the integrity of SIPL's operations and upholding our ethical standards.

### Reporting Party Information:

Name (optional):

Job Title (optional):

Department (optional):

Contact Information (optional):

### Incident Details:

Date of Incident:

Time of Incident:

Location of Incident:

Individuals Involved (if known):

Description of Incident or Concern (please provide as much detail as possible):

### Supporting Documents or Evidence (if applicable):

Attach any relevant documents, emails, photos, or other evidence that may support your report.

### Preferred Method of Contact for Follow-up (optional):

Email:

Phone:

### Anonymous Reporting Option:

If you wish to remain anonymous, please do not provide your contact information. However, providing contact information can be helpful if further clarification is needed during the investigation process.

**Confidentiality:**

We are committed to maintaining the confidentiality of all reports and protecting the identity of whistleblowers. Reports will be shared only with individuals involved in the investigation process on a need-to-know basis.

**Submission:**

Please submit this form to the designated reporting channel, which may include dedicated email addresses, reporting hotlines, or other mechanisms established by the company.

Thank you for your commitment to our ethical values and your willingness to contribute to a culture of integrity within Solon India Private Limited. Your report plays a crucial role in preventing fraudulent and corrupt activities and ensuring that our operations remain aligned with our principles.



## Appendix C: Anti-Corruption Clauses for Contracts

As part of Solon India Private Limited's commitment to ethical business practices and preventing corruption, the following clauses are to be included in all contracts entered into by SIPL. These clauses reinforce our stance against bribery, kickbacks, and other forms of corrupt activities and ensure that our partners, suppliers, and contractors are aligned with our commitment to integrity and transparency.

### **1. Anti-Corruption Clause:**

Both parties to this contract acknowledge and agree to abide by all applicable anti-corruption laws and regulations, including but not limited to the Foreign Corrupt Practices Act (FCPA) and the Local Anti-Corruption and Anti-Fraud Laws. No party shall engage in any form of bribery, kickbacks, or other corrupt practices, whether directly or indirectly, to obtain or retain business, secure an advantage, or influence the decisions of the other party.

### **2. Compliance with Policies:**

Both parties shall adhere to the Anti-Fraud and Anti-Corruption Policy of Solon India Private Limited. This policy outlines our commitment to maintaining the highest ethical standards and preventing fraudulent and corrupt activities. The parties shall ensure that their employees, contractors, agents, and representatives are aware of and compliant with the policy.

### **3. Reporting of Concerns:**

Both parties shall promptly report any suspicions or concerns of corrupt or unethical behavior to their respective compliance departments or designated contacts. Timely reporting is essential in preventing and addressing potential issues and maintaining transparency in our business relationships.

### **4. Audit and Review:**

Upon reasonable notice, both parties agree to allow Solon India Private Limited to conduct audits or reviews to ensure compliance with anti-corruption laws, regulations, and policies. This may include reviewing financial records, transactions, and internal controls related to the performance of this contract.

### **5. Termination for Non-Compliance:**

In the event of a breach of this anti-corruption clause or any related anti-corruption laws, either party may terminate this contract immediately without liability or penalty. Such termination shall not prejudice any legal rights or remedies available to the non-breaching party.

By incorporating these anti-corruption clauses into SIPL's contracts, we affirm our dedication to ethical conduct and our commitment to working with partners who share our values. These

clauses not only protect our company from potential corrupt activities but also contribute to a business environment characterized by integrity and responsible practices.

## Appendix D: Sample Training Modules

Training is a critical component of our Anti-Fraud and Anti-Corruption Policy. The following sample training modules are designed to educate our employees, contractors, partners, and stakeholders about the principles outlined in the policy and equip them with the knowledge and skills to prevent, detect, and address fraudulent and corrupt activities.

### **1. Introduction to Anti-Fraud and Anti-Corruption Policy:**

This module provides an overview of the policy's key principles, objectives, and scope. Participants will understand the importance of ethical conduct, transparency, and accountability in Solon India Private Limited.

### **2. Identifying Red Flags and Suspicious Activities:**

In this module, participants learn to recognize common signs of potential fraud and corruption. Through real-world scenarios, they develop the ability to identify behaviors and situations that may indicate unethical conduct.

### **3. Reporting Mechanisms and Whistleblower Protection:**

This module educates participants about the various reporting channels available for reporting suspicious activities or policy violations. Participants will understand the importance of timely reporting and the protections in place for whistleblowers.

### **4. Vendor and Supplier Due Diligence:**

Participants will learn about the importance of vetting vendors and suppliers to ensure they share our commitment to ethical behavior. The module covers due diligence procedures, risk assessments, and the inclusion of anti-corruption clauses in contracts.

### **5. Project Monitoring and Compliance:**

This module emphasizes the significance of project oversight in preventing fraud and corruption. Participants will understand how to monitor project activities, track expenditures, and ensure compliance with ethical standards and regulations.

### **6. Conflict of Interest and Gifts:**

Participants learn about potential conflicts of interest that may arise in their roles and how to navigate them ethically. The module also addresses guidelines for giving and receiving gifts, entertainment, and hospitality.

### **7. Handling Donations and Contributions:**



This module provides guidance on making ethical decisions when it comes to making donations, contributions, or sponsorships. Participants will understand the importance of transparency and compliance with relevant laws and regulations.

#### **8. Internal Controls and Financial Transparency:**

Participants gain insights into the significance of financial controls, accurate reporting, and transparent accounting practices. The module covers expense reporting, approval procedures, and the role of employees in upholding financial integrity.

These sample training modules are designed to specific needs and industry context of Solon India Private Limited. Regular training sessions will ensure that all individuals associated with SIPL are equipped with the knowledge and skills necessary to promote a culture of integrity and prevent fraudulent and corrupt activities.

## Appendix E: Acknowledgment of Receipt and Understanding

By signing below, I acknowledge that I have received a copy of the Anti-Fraud and Anti-Corruption Policy of Solon India Private Limited and have read, understood, and agreed to comply with its principles and guidelines. I understand that this policy is a critical component of our company's commitment to ethical behavior, transparency, and accountability, and I am committed to upholding its values in all my interactions and responsibilities within the organization.

I understand that it is my responsibility to be aware of and adhere to the standards outlined in the policy, and I recognize the importance of reporting any suspicious activities, policy violations, or unethical behavior promptly and transparently. I am aware of the available reporting mechanisms, including the whistleblower protection provisions, and I understand that my concerns will be addressed with confidentiality and without fear of retaliation.

I also acknowledge that the Anti-Fraud and Anti-Corruption Policy may be subject to updates and revisions as needed. I am committed to staying informed about any changes and to continuously improving my understanding of ethical business practices and the prevention of fraudulent and corrupt activities.

By signing this acknowledgment, I affirm my commitment to maintaining the highest standards of integrity, transparency, and accountability within Solon India Private Limited and contributing to a culture that aligns with our ethical principles.

Employee Name: \_\_\_\_\_  
\_\_\_\_\_

Date:

Employee Signature: \_\_\_\_\_

Please print and sign this form and return it to the designated department or individual responsible for policy compliance. Your acknowledgment of receipt and understanding is vital to the successful implementation of our Anti-Fraud and Anti-Corruption Policy.



