

Anti-Corruption and Anti-Bribery Policy

of Baazar Style Retail Limited

Control Summary

Version	Approving Authority	Date of Approval
1	Board of Directors	August 1, 2025

1. Purpose

Baazar Style Retail Limited (hereinafter referred to as "the Company") is committed to conducting its business operations with the highest standards of integrity, ethics, and professionalism. This policy enunciates the Company's zero-tolerance stance towards any form of bribery or corruption. By adhering to this policy, the Company aims to foster a culture of transparency, accountability, and fairness in all its dealings, ensuring compliance with applicable laws and regulations.

2. Scope and Applicability

This policy applies to all individuals associated with the Company, including but not limited to employees, officers, directors, contractors, business partners, agents, suppliers, and other third parties acting on behalf of the Company. The provisions outlined in this document are binding on all stakeholders, irrespective of their role or geographical location, and are integral to maintaining ethical business practices.

3. Definitions

- **Anything of Value:** Includes tangible and intangible items such as money, gifts, hospitality, travel, employment offers, debt forgiveness, charitable donations, or any transfer of goods, services, or benefits.
- **Bribery:** Offering, giving, receiving, or soliciting anything of value to influence decisions, gain undue advantages, or obtain improper benefits in the course of business operations.
- **Business Partner:** Any entity or individual authorized to act on behalf of the Company, including agents, consultants, vendors, and joint venture partners.
- **Facilitation Payment:** Small, unofficial payments made to expedite routine government actions.
- **Hospitality:** Meals, entertainment, travel, or attendance at professional events provided at a reduced or no cost.

4. Policy

The Company strictly prohibits any form of bribery, corruption, or unethical conduct in its business dealings. This includes:

4.1. Prohibition of Bribery and Corruption:

- Offering, providing, or receiving bribes, kickbacks, or facilitation payments to influence decisions or gain advantages is strictly forbidden.

- Employees must avoid any activity that could create the appearance of improper conduct.
- 4.2. Compliance with Laws: The Company adheres to all applicable anti-corruption laws, including but not limited to the Prevention of Corruption Act, 1988, and other relevant regulations in jurisdictions where it operates.
- 4.3. Risk Assessment and Internal Controls:
- Periodic risk assessments will be conducted to identify potential corruption risks in the Company's operations.
 - Robust internal controls will be implemented to mitigate risks and monitor compliance.
- 4.4. Gifts and Hospitality:
- Employees are prohibited from accepting or offering gifts or hospitality that could influence business decisions or create a conflict of interest.
 - Exceptions may be made for nominal, customary gifts and hospitality, provided they are transparently reported.
- 4.5. Disciplinary Action:
- Violations of this policy will result in disciplinary action, which may include termination of employment or contractual agreements.
 - Legal actions may also be pursued where applicable.

5. Mechanism for Complaints

The Company has established a transparent and secure mechanism to address complaints related to bribery and corruption:

- Whistle-Blowing Platform: A dedicated and confidential platform is available for reporting suspected violations of this policy.
- Investigation Process: All reported incidents will be investigated thoroughly, maintaining confidentiality and impartiality.
- Non-Retaliation: The Company strictly prohibits retaliation against individuals who report concerns in good faith.

6. Training and Awareness

- 6.1. **Employee Training:** Regular training sessions will be conducted to ensure employees understand the provisions of this policy and their responsibilities under anti-corruption laws. Specialized training will be provided for roles with heightened exposure to corruption risks.

- 6.2. **Awareness Campaigns:** Continuous awareness initiatives will be implemented to reinforce the Company's commitment to ethical business practices.

7. Governance and Oversight

- 7.1. **Executive Commitment:** The Board of Directors and senior management are committed to the effective implementation and enforcement of this policy.
- 7.2. **Monitoring and Reporting:**
Compliance Officer of the Company will oversee adherence to this policy and report on its implementation to the Board.
Annual reviews of the policy will be conducted to ensure its relevance and effectiveness.

8. Reporting Concerns

8.1. **Raising Concerns:**

- Employees and stakeholders are encouraged to report suspected violations through the designated whistle-blowing platform or directly to the Compliance Officer.
- Reports can also be submitted anonymously if preferred.

- 8.2. **Contact Information:** For any queries or to report concerns, individuals may contact the Compliance Officer abinash.singh@stylebaazar.com.

9. Review and Amendments

This policy will be reviewed periodically and amended as necessary to align with legal and regulatory developments, as well as the evolving business landscape.
