

**CORPORATE GOVERNANCE
ANTI BRIBERY AND CORRUPTION POLICY**


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	<i>Policy Owner</i>	<i>Board Spaceworld Group LLP</i>
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1.0 Preamble

Space World Group and its managed entities -

- Space World Group LLP
- Space Telelink Ltd.
- RANext Technologies Pvt. Ltd.
- Horizon Performance Polyurethane Pvt. Ltd.
- Space World Digital Solutions Private Ltd.
- P2P Networks Private Limited
- P2P Networks (Mumbai) Private Limited

collectively referred to as the “Company”, for the purpose of this policy. The Company is committed to upholding the highest ethical standards, conducting business with transparency and fairness, adhering to top-tier corporate governance practices, and safeguarding its reputation at all levels. It strives to deliver exceptional services in a highly professional manner, ensuring that every transaction and service aligns with the principles outlined in the Code and reflects our core values.

This Policy should be read in conjunction with the Code of Business Conduct and Ethics (“the Code”), which serves as a guide for how you should conduct yourself as a member of Space World Group.

2.0 Objective

The purpose of this Policy is to, among other things:

- Encourage Directors, CEOs and employees to:
 - Act with honour and integrity in all business interactions of the Company.
 - Recognize and appropriately address any potential conflicts of interest.
 - Take proactive measures to ensure that no financial or other incentives are either offered or accepted on behalf of the Company.
- Encourage directors, CEOs and employees to remain alert, act diligently, and operate in good faith.
- Establish a unified understanding among all stakeholders that the Company stands firmly against bribery and corruption in all its forms.

Ethical behaviour forms the cornerstone of our operations, and it is crucial that our brand represents integrity, trust, and high ethical standards.

3.0 Scope

The policy applies to

- all Directors, CEOs, employees¹, and off-roll associates (on third Party payroll)
- partners including vendors and representatives or any other persons/individuals, who may be acting on behalf of the Company.

¹ It is to be noted that, wherever the term Employee is used, the relevant clause of the code shall also be applicable to off-roll

associates (on third party payroll).

4.0 Guidelines

4.1 Zero Tolerance approach Against Bribery

Do not give or receive bribes, including facilitation payments.

The giving or receiving of bribes, including facilitation payments, is strictly prohibited. Ethical conduct forms a fundamental part of our core values and is expected of all Directors, CEOs and employees. By holding ourselves to the highest ethical standards, we protect the company's reputation for integrity. This commitment fosters confidence among our customers, clients, service providers, investors, stakeholders, and others, which ultimately benefits our business.

We adopt a zero-tolerance policy toward bribery, a principle upheld by our top management. We neither pay nor offer bribes directly or indirectly to advance our business interests, nor are you authorized to do so on our behalf.

A bribe refers to anything of value offered, promised, or given to improperly influence a decision or to secure an unfair advantage in obtaining or maintaining business. It is essential to recognize that a corrupt act has occurred even if:

- The bribe is not successful.
- A bribe is authorized or directed but not ultimately given.

Bribery may take various forms, such as:

- Cash or equivalents (e.g., gift cards), stock, or loans.
- Gifts, meals, entertainment, or travel.
- Political or charitable donations, sponsorships.
- Job offers, internships, directorships, or secondments.
- Procurement and service contracts.
- Fictitious jobs or consulting agreements.
- Excessive discounts or rebates.

Facilitation payments are also considered bribes and are therefore prohibited. "Facilitation payments" are unofficial payments to induce officials to perform or expedite routine functions that they are otherwise obliged to perform. These are often paid in addition to a scheduled official fee and usually involve relatively small sums of money to speed up routine actions or encourage officials to perform duties they are already obligated to do, such as issuing permits or customs releases. They are sometimes referred to as 'speed' money or 'grease' payments or 'good-will money'.

For more information, refer to the company's Code of Business Conduct and Ethics ("the Code") which details the actions we take to prevent and detect bribery within our operations.

4.2 Interaction with Public Officials

Interactions with public officials require greater care and scrutiny.

A "Public Official" refers to:

- i. Any individual holding a legislative, executive, or administrative office within the government, or acting on behalf of or in the official capacity of such an office, whether appointed or elected, permanent or temporary, and whether paid or unpaid;
- ii. Any individual employed by or receiving compensation from the government, or by a corporation established under government statutes, or an authority or entity owned,

controlled, or supported by the government, or a government company, or who is paid by the government through fees or commissions for performing public duties;

iii. Any judge or person empowered by law to carry out adjudicatory functions, whether alone or as part of a panel;

iv. Any person authorized by a court to carry out duties related to the administration of justice, such as a liquidator, receiver, or commissioner;

v. Any individual who performs a public duty, including those working for public agencies, enterprises, or providing public services as defined by the State laws, and within the relevant legal context. For example, if a government has an interest in a utility and exercises control over the activities of that utility, then the utility's officials are likely to be considered public officials. Third parties acting at the direction of these individuals and entities should also be considered public officials.

vi. Any elected or appointed officials or employees of public international or multilateral organizations, such as the United Nations;

vii. Any other person regarded as a public official under applicable laws and regulations.

Due to the higher risk of bribery in dealings with public officials, it is crucial to be mindful of these risks and consider how your actions might be perceived. For example, offering gifts or employment to the relatives of public officials can be seen as indirect bribery and should be avoided.

Hiring public officials or their relatives requires careful review to avoid any appearance of bribery. Consult the company's Group CHRO for the procedures to assess and manage such risks.

4.3 Third-Party Relationships

The term "third party" includes any individual or organization, who/which comes into contact with the Company or transacts with the Company and also includes actual and potential clients, vendors, consultants, retainers, agents, advisors, distributors, business associates, partners (including academic institutions), contractors, suppliers or service providers who work for and on behalf of the Company. Third parties are prohibited from offering bribes on behalf of the company.

The company can be held accountable if it fails to detect and prevent bribery by its associates. This includes anyone performing services on our behalf, such as contractors, joint venture partners, and agents. We must avoid working with third parties who do not share our zero-tolerance stance on bribery.

Due diligence is preferable when engaging with third parties to assess their anti-bribery policies and reputation. This may involve meetings to evaluate their business practices and controls or researching their track record. Contracts should also include anti-bribery clauses as well as right to audit clause where appropriate.

Our Company may be held responsible for bribes paid on its behalf by third parties, with severe and often irreparable consequences, even if our Company did not authorize these payments. Therefore, it is critical that we are careful in the selection of third parties.

4.4 Gifts, Meals, and Entertainment

Offering or accepting gifts, meals, or entertainment should always be appropriate, reasonable, and tied to legitimate business purposes, not intended to improperly influence decisions.

Gifts (such as merchandise or event tickets) given to or received from individuals with a business relationship with the company are generally acceptable, provided they are of reasonable value, infrequent, suitable for the business relationship, and do not create an appearance of impropriety. Cash payments should never be given or received.

Meals and entertainment can be acceptable if they are reasonable in value, occasional, and aligned with business objectives. However, if the event does not include a representative from the sponsoring organization, it will be regarded as a gift, not an entertainment expense. Be aware of restrictions on gifts or entertainment for public officials or their relatives, as applicable in many jurisdictions.

Gifts, meals, and entertainment that are repetitive, regardless of their value, may be seen as an attempt to create an obligation to the giver and should therefore be avoided. Additionally, providing gifts or entertainment close to the time of a decision that impacts the company's business (including decisions by private business partners) could be perceived as a bribe for a favorable decision, and therefore should be avoided. Directors and employees should also refrain from personally paying for gifts, meals, or entertainment to prevent the need for reporting or approval.

Travel expenses should be handled similarly to gifts, meals, and entertainment. Payments should be made directly to the service provider, not reimbursed to the individual, and cash reimbursements should not be issued.

Please read the Gifts Entertainment and Hospitality policy for more details.

4.5 Political Donations and Lobbying

Political contributions or donations to political parties or officials are not allowed, either directly or indirectly, using company resources.

The Company refrains from offering support or making any contributions to political parties, their officials, or any individuals connected to them. It does not engage in political activities or sponsor any political party, its candidates, affiliates, or related entities, either directly or indirectly. The use of company funds for financing political parties, campaigns, or public office candidates is strictly prohibited. Any political donations made by individuals must be separate from the company's operations and comply with applicable local laws and regulations.

Refrain from engaging in any lobbying activities on behalf of the company unless explicitly authorized.

Lobbying activities involve efforts to influence the introduction, passage, or defeat of legislation, and may require registration and reporting under certain regulations. In some regions, lobbying is also defined to include actions aimed at influencing rulemaking by executive agencies or other official actions, such as decisions regarding contracts or agreements.

You must not engage in lobbying activities on behalf of the company without the prior written approval of the Group Financial Controller who is designated to approve such activities.

4.6 Charitable Donations

Do not request or provide donations to clients, suppliers, vendors, public officials, or others in a manner that implies a donation is required for future business opportunities or that the donation is being made with the intent to secure or retain business advantages.

While we encourage our Directors, CEOs and employees to volunteer personal time and resources to charitable and nonprofit causes, you are prohibited from using the company's name or resources to solicit donations unless the request is formally supported by the company.

Charitable contributions may include:

- Requesting donations on behalf of the company
- Donating time, money, or property
- Using company time, facilities, or services to support charitable organizations
- Contributing a portion of revenue to state-owned enterprises dedicated to charitable purposes
- Raising funds for community activities

Requests for donations may come in various forms, including direct requests or indirect approaches such as purchasing tickets for events, participating in charity golf outings, or contributing to events designed to raise money for a specific cause. All corporate donations to charities or nonprofit organizations, including schools, hospitals, or libraries, must be approved in advance by the Group CHRO. If a public official requests a donation to a particular charity, please seek approval from Group CHRO before making any commitment. Additionally, it is important to perform due diligence on any lesser-known charity or nonprofit to ensure its legitimacy.

5.0 Record-Keeping

It is essential to record all transactions accurately, thoroughly, and in detail to ensure the purpose and amount of each transaction are clearly understood.

Anti-bribery laws, along with other relevant regulations, require precise and complete record-keeping and the implementation of effective internal control systems. These measures are designed to prevent the concealment of bribes and to discourage fraudulent accounting practices.

Every transaction must be documented in full, with accurate details that clearly outline the purpose and value of any payment. Under no circumstances should undisclosed or unrecorded company funds or assets be created for any reason. The company's books and records must not include any false, misleading, or fabricated entries for any purpose.

6.0 Reporting and Concerns

Internal reporting is essential for the company's success and is both encouraged and highly valued. You are expected to act proactively by promptly reporting any suspected breaches of this Policy, as well as any illegal or unethical conduct you may encounter. This includes situations where a public official or any other individual requests or seems to request an improper benefit. Reports will be kept confidential to the greatest extent possible, subject to the need for a proper investigation and any applicable laws. No retaliation will be directed at anyone who submits a report in good faith, believing a violation of the Policy has occurred or may occur.

All Directors, CEOs and Employees are encouraged to report any breaches to their supervisor, who is usually in the best position to address the matter. Alternatively, concerns can be directed to the company's Group CHRO for reporting misconduct or Policy violations, or for any related inquiries. CEOs should report any violations directly to the Chair of the Board of Directors. Detailed information about the reporting hotline can be found in the Code.

7.0 Disciplinary Measures for Policy Violations

The Company reserve the right to impose disciplinary actions for any violations of this Policy, tailored to the nature and specifics of the infraction. In the most serious cases, this may result in immediate termination for cause, and if necessary, legal action may be pursued.

CONTACT INFORMATION

Reporting channels	Contact information
Phone	011 - 23071071
Email	ombudsperson@spaceworld.in
Address	Space World Group LLP, 22-A, JLG House, Windsor Place, Janpath, Connaught Place, New Delhi - 110001

Management reserves the right to modify or terminate this policy without prior notice.