

Anti Bribery and Corruption Policy

1. Aragen has a zero-tolerance policy towards bribery and Corruption in any form.
2. All internal and external stakeholders working for or acting on behalf of Aragen must comply with applicable national/ international anti-bribery and anti-corruption laws and regulations.
3. Offering, giving, receiving, or soliciting bribes or any form of improper payment, including gifts, hospitality, or favors intended to influence business decisions, is strictly prohibited.
4. The policy applies to all dealings with third parties, including suppliers, contractors, and agents. Due diligence is to be conducted to ensure compliance with anti-bribery and anti-corruption standards.
5. Employees are required to report any suspected or actual instances of bribery, corruption or policy violations through designated reporting channels without fear of retaliation.
6. For infractions or suspected violations, employees should contact the ombudsperson as outlined in the Whistleblower policy.
7. Regular training and awareness programs on anti-bribery and anti-corruption policies will be provided to all employees.
8. Accurate and complete records of all transactions, expenses, and gifts must be maintained to ensure transparency and accountability.
9. Any gifts or hospitality offered or received must be reasonable, proportionate and not intended to influence business outcomes. They must be reported and recorded as per company policy.
10. Regular monitoring and internal audits will be conducted to ensure compliance with the anti-bribery and anti-corruption policy.
11. Violations of this policy will result in disciplinary action, which may include termination of employment and legal action as applicable.

This policy will be communicated within Aragen, made available to the relevant interested parties, periodically reviewed and updated, as necessary.

Date: 23rd March 2022

A handwritten signature in black ink, appearing to read "S. Anubolu".

Suresh Anubolu
Chief Human Resources Officer