

## ANTI-BRIBERY AND ANTI-CORRUPTION (ABAC) POLICY

At Celegence, we are committed to conducting our business with the highest standards of ethics, integrity, and transparency. Our Anti-Bribery and Anti-Corruption (ABAC) Policy reflects our zero-tolerance stance toward any form of bribery, corruption, or unethical conduct.

### 1. SCOPE

This policy applies to:

- All employees (full-time, part-time, and contract)
- Vendors, consultants, distributors, and business partners
- All geographies where Celegence operates (India, US, UK, Netherlands)
- All interactions with government, healthcare, and private sector entities

### 2. OUR COMMITMENTS

- **No Bribes:** Celegence strictly prohibits offering, giving, or accepting bribes—directly or indirectly, including gifts, cash, favors, or hospitality intended to influence decisions.
- **No Kickbacks:** We do not condone receiving or giving rewards for securing business contracts.
- **Gifts & Hospitality:** Modest, customary tokens may be accepted or offered. Lavish or inappropriate gifts (e.g., cash, luxury items) are not permitted.
- **Third-Party Conduct:** Our vendors and partners are expected to comply with our ABAC principles, and we embed anti-bribery clauses in all contracts.
- **No Political Contributions:** Celegence does not make political donations on behalf of the company.
- **Charitable Contributions:** Donations are allowed only with due diligence and management approval.

### **3. COMPLIANCE WITH GLOBAL LAWS**

We comply with key anti-corruption laws, including:

- UK Bribery Act, 2010
- US Foreign Corrupt Practices Act (FCPA)
- Dutch Criminal Code (Articles 177 & 178)
- India's Prevention of Corruption Act, 1988

### **4. REPORTING AND PROTECTION**

Celegence encourages employees and stakeholders to report suspected bribery or unethical behaviour. Reports can be made confidentially to: [hr@celegence.com](mailto:hr@celegence.com).

**We strictly prohibit retaliation against whistleblowers.**

### **5. TRAINING AND CONSEQUENCES**

- Annual training ensures awareness and compliance.
- Violations may lead to disciplinary action, termination, and/or legal consequences.