



**DATUM**  
ADVANCED COMPOSITES

# Datum Anti-Bribery and Corruption Policy

VERSION 1.0

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**DATUM COMPANY POLICY**

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**DELIVERING ADVANCED COMPOSITE SYSTEMS AND  
SPECIALIST ENGINEERING SERVICES WITH PRIDE**



# CONTENTS



01 Scope and Purpose of this Policy	... 03
02 Policy Overview	... 04
03 Prohibited Activities	... 05
04 Procedures	... 06
05 Frequently Asked Questions	... 07

# 01

## SCOPE AND PURPOSE OF THIS POLICY

### TO WHOM DOES THIS POLICY APPLY?

This Anti-Bribery and Corruption Policy applies to all employees, contractors, consultants, and third parties associated with Datum Advanced Composites Private Limited (referred to as "Datum" hereafter). It encompasses all operations, functions, and activities conducted by Datum, both domestically and internationally.

### PURPOSE OF THIS POLICY

The purpose of this policy is to outline Datum's commitment to preventing bribery and corruption in all aspects of its business operations. Datum is dedicated to conducting business ethically, maintaining integrity, and complying with all applicable laws and regulations related to anti-bribery and anti-corruption.

# 02

## POLICY OVERVIEW

This Anti-Bribery and Corruption Policy is essential in upholding Datum's commitment to ethical business practices and ensuring the integrity of our operations. All employees, contractors, consultants, and associates must familiarise themselves with and adhere to this policy to maintain Datum's reputation as a responsible and principled organisation.

## KEY PRINCIPALS

Datum adheres to the following key principles in its commitment to combat bribery and corruption:

**Zero Tolerance:** Datum has a zero-tolerance stance towards bribery and corruption in any form.

**Compliance:** Datum complies with all relevant anti-bribery and anti-corruption laws and regulations, as per Prevention of Corruption Act, 1988, India, and international anti-corruption conventions.

**Due Diligence:** Datum conducts due diligence on all business partners, agents, contractors, and third parties to ensure they share our commitment to anti-bribery and anti-corruption.

**Transparency:** Datum maintains transparency in all its business operations, transactions, and financial reporting.

### DO

- △ All Datum employees and associates are encouraged to report any instances or suspicions of bribery or corruption promptly.
- △ Fully cooperate with any internal or external investigations into potential breaches of this policy.
- △ Seek guidance and clarification from the Compliance Officer if uncertain about any situation related to bribery or corruption.

### DON'T

- △ Offer, promise, give, or accept bribes, kickbacks, or any form of improper inducement or influence.
- △ Engage in any activities that may facilitate or promote bribery or corruption, both within and outside Datum.

# 03

## PROHIBITED ACTIVITIES

All employees, contractors, and representatives of DAC are eligible to seek reimbursement for expenses incurred during approved business travel.

### BRIBERY

Datum strictly prohibits the offering, giving, receiving, or soliciting of bribes, kickbacks, or any other form of improper payment to or from any individual, company, or organisation.

### FACILITATION PAYMENTS

We do not tolerate facilitation payments, even if they are considered customary in some regions.

### GIFTS AND HOSPITALITY

Gifts and hospitality may be exchanged as long as they are reasonable, transparent, and not intended to influence business decisions. However, extravagant or inappropriate gifts are strictly prohibited.

### POLITICAL CONTRIBUTIONS

Datum does not make political contributions, donations, or engage in any political activities that might compromise our impartiality or compliance with applicable laws.

# 04

## PROCEDURES



## REPORTING AND WHISTLEBLOWING

Employees and stakeholders are encouraged to report any suspected violations of this policy promptly. Datum will maintain a confidential and anonymous reporting mechanism for this purpose. No retaliation will be tolerated against individuals who report in good faith.

## COMPLIANCE AND TRAINING

Datum is committed to providing adequate training and resources to ensure that all employees and relevant stakeholders understand and adhere to this policy. Regular training and awareness programs will be conducted to promote compliance.

## POLICY REVIEW

This policy will be reviewed and updated periodically to reflect changes in anti-bribery and corruption laws and regulations and to ensure its continued effectiveness in preventing bribery and corruption within Datum Advanced Composites.

# 05

## FREQUENTLY ASKED QUESTIONS

### What should I do if I suspect an instance of bribery or corruption?

Report it immediately to the Compliance Officer or use the confidential reporting mechanism provided by Datum.

### Are gifts and hospitality allowed in business dealings?

Gifts and hospitality may be allowed if they are of nominal value (less than ₹ 2,500), transparent, and comply with Datum's policies. However, they should not be used as a means to facilitate bribery or corruption.

### What are the consequences of violating this policy?

Violations of this policy can lead to disciplinary actions, including termination, as outlined in Datum's Code of Conduct. Legal actions may also be pursued, depending on the severity of the violation and applicable laws.

### Key Reference Documents

- △ Datum Code of Conduct
- △ Anti-Bribery and Corruption Laws and Regulations
- △ Datum Whistleblower and Protection Policy
- △ Contractual Agreements
- △ Internal Compliance Procedures and Guidelines
- △ Datum Mandatory Training

### Key Contacts

- △ Human Resource Executive
- △ Head of Legal and Compliance
- △ Datum Senior Leadership
- △ Third-Party Vendors and Partner
- △ External Legal Counsel
- △ Government Authorities

# DATUM



## ADVANCED COMPOSITES

**DATUM ADVANCED COMPOSITES PRIVATE LIMITED**  
117 / H2 / 124, PANDU NAGAR, KANPUR – 208005, UTTAR PRADESH, INDIA

[WWW.DATUMLIMITED.COM](http://WWW.DATUMLIMITED.COM)  
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