

Anti-Bribery and Anti-Corruption Policy

SENZAIT PRIVATE LIMITED (CIN U73100GJ2022PTC136935) · Version 1.0 · Effective 1 October 2026
· Approved by Mr. Vishalkumar Suthar, Director · Reviewed at least once a year

Our position

SENZAIT does not pay bribes, does not accept them, and does not let anyone pay or accept them on our behalf. This applies whether the other party is a government official or a private company, whether the amount is large or small, and whether or not such payments are common where we happen to be working. We would rather lose an order than win it this way.

This policy applies to every director, employee, trainee, contractor and agent of SENZAIT, and it states what we expect of the suppliers, freight forwarders, customs agents, liaison agents and consultants we work with.

What counts as a bribe

A bribe is anything of value offered, promised, given, requested or accepted to influence someone improperly in their work, or to reward them for having been influenced. It does not have to be cash. It can be a gift, a meal, travel, a job for a relative, a donation, a discount, a favour, or a promise of any of these. Offering is enough: the bribe does not have to be accepted or paid for the offence to be complete.

Under the Prevention of Corruption Act 1988, as amended in 2018, both the person who gives and the person who takes a bribe commit an offence, and a company can be held liable for a bribe paid by anyone acting for it. Because we export, laws such as the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act can also reach our conduct through the clients we serve.

Speed money

Small payments to get a routine government action done faster or at all, such as a clearance, a signature, a certificate, an inspection date or a release of goods, are bribes under this policy and under Indian law. We do not pay them, and we do not let a

customs agent, courier or liaison agent pay them for us and bill us for it under another name. If a payment is demanded, the person asked reports it to the Director and we take the slower, lawful route.

The only exception is a genuine, immediate threat to someone's safety or liberty. A payment made under such a threat must be reported to the Director within one working day and recorded accurately.

Gifts and hospitality

Modest gifts and hospitality are part of doing business in India and elsewhere, and they are permitted only when all of the following are true:

- they are offered openly, not secretly, and would not embarrass us if published;
- they are not cash or anything like cash, such as vouchers, gift cards, loans or shares;
- they are not offered or accepted during a tender, negotiation, inspection or approval that the other party can influence;
- they are proportionate, and never offered to a government official beyond a token of nominal value at a customary occasion;
- the value is within our ceiling: 5,000 rupees per gift, and 25,000 rupees in total to or from any one person or organisation in a financial year.

Anything above the ceiling, and anything at all involving a government official, requires the written approval of the Director before it is given or accepted, and is recorded in our gifts register with the date, the parties, the value and the reason. Where it is impolite to refuse a gift above the ceiling, it is accepted on behalf of the company, recorded, and either shared with the whole team or donated.

Donations and sponsorship

SENZAIT makes no political contributions of any kind. Charitable donations and sponsorships are made only to genuine, registered organisations, only by bank transfer, never in cash, never to an individual's account, never at the request of a customer's or official's representative in connection with our business, and only with the Director's written approval. Each is recorded.

Agents and third parties

We can be held responsible for what is done in our name. Before we appoint a customs agent, freight forwarder, liaison agent, sales agent or consultant, we check who they are, what they will do, how they are paid and whether the fee is reasonable for the work. Their appointment is in writing, includes an undertaking to comply with this policy and a right for us to end the engagement if they breach it. We pay only against proper invoices to the agent's own bank account, and we do not pay success fees that cannot be explained by the work done.

Warning signs we act on: a request for payment in cash or to a third country; a fee out of proportion to the service; a refusal to put the engagement in writing; a claim to have a "special relationship" with an official; a request to hire a relative; an invoice that does not describe the work.

Books and records

Every payment we make and receive is recorded accurately, promptly and with enough detail to show what it was for. No payment is disguised under another heading, and no fund or account is kept outside the books.

Reporting

Anyone who is asked for a bribe, offered one, or sees or suspects a breach of this policy must report it through our Speak Up Policy: an email to info@senzait.com with the subject line "SPEAK UP". A suspected breach can also be raised with the Director directly. Nobody suffers for raising a concern in good faith. Suppliers and clients who suspect a breach by anyone acting for SENZAIT are asked to use the same channel.

Consequences

A breach of this policy by an employee is gross misconduct. A breach by an agent, contractor or supplier ends the relationship. Where the law has been broken we cooperate fully with the authorities, and the individual concerned may face prosecution, fines and imprisonment under the Prevention of Corruption Act.

Responsibility and training

The Director owns this policy, approves every exception, keeps the gifts and donations registers, and explains the policy to every new joiner and every new agent at the start of the relationship. It is reviewed at least once a year.

Mr. Vishalkumar Suthar, Director · SENZAIT PRIVATE LIMITED · Gandhinagar, 1 October 2026