



BIPS SYSTEMS LIMITED

Reg. Office: E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024
Corporate Identification Number (CIN): U74899DL1995PLC067140
Compliance Desk: compliance@bipssystems.com | **Website:** bipssystems.com

CORPORATE ANTI-BRIBERY & ANTI-CORRUPTION POLICY (ABAC POLICY)

1. Purpose & Core Philosophy

BIPS Systems Limited (hereinafter referred to as "BIPS" or the "Company") operates its multi-disciplinary business verticals—including Information Technology infrastructure solutions, advanced industrial instrumentation, SCADA-based barrage automation, disaster management platforms, electronic surveillance setups, customized software application engineering, and facility management services—with an unyielding commitment to statutory compliance, corporate integrity, and business ethics.

This Corporate Anti-Bribery & Anti-Corruption Policy ("ABAC Policy") establishes the binding legal and behavioral standards required to eliminate bribery and corruption across all corporate undertakings. BIPS enforces an absolute **Zero-Tolerance** stance against all corrupt activities. The Company will continuously uphold the explicit provisions of the **Prevention of Corruption Act, 1988 (India)**, along with all subsequent legal amendments, and any relevant regional anti-graft statutes in every jurisdiction where it maintains active project fields, construction sites, manufacturing assets, or branch offices.

2. Scope & Universal Applicability

This policy applies universally to all stakeholders associated with BIPS, regardless of hierarchy, operational department, or geographic territory. This encompasses:

- **Internal Stakeholders:** All permanent employees, temporary workers, fixed-term staff, trainees, interns, outsourced technical personnel, engineering teams, site managers, project heads, senior officers, and members of the Board of Directors.
- **External Stakeholders (Third Parties):** All business partners, value-added distributors, sub-contractors, system integrators, joint-venture consortium members, hardware suppliers, software vendors, service providers, logistics consultants, liaison agents, and any individual or corporate entity executing work on behalf of, or in connection with, BIPS.

3. Absolute Prohibitions and Strict Legal Compliance

A. Offering or Accepting Bribes & Kickbacks

BIPS SYSTEMS LIMITED

Regd. Office : E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024 Ph.: +91-11-26483817, 26212946 Mob.: 9873199001
Branch Off. : 1/6, 1st Floor, Gokhle Marg, Opp. Red Hill School, Lucknow - 226001, (U.P.) Ph.: +91-522-4000310
Works : Khasra No.1252, Delhi Saharanpur Road, Baghpat - 250609, (U.P.) Ph.: +91-9289477297, 9289477293
E-mail : sales@bipssystems.com, support@bipssystems.com
Website : www.bipssystems.com **CIN :** U74999DL1991PLC046556



No employee or third party acting on behalf of BIPS shall offer, promise, authorize, pay, demand, solicit, or accept any bribe, kickback, illegal gratification, under-the-table financial incentive, or personal favor.

A "bribe" or "corrupt inducement" includes giving or receiving anything of physical, digital, commercial, or personal monetary value—such as cash payments, unapproved discounts, structural rebates, job offers, commercial contracts, or luxury items—to unfairly manipulate an official or commercial decision.

B. Stringent Rules for Government and PSU Engagements

Given that BIPS actively executes critical high-value turnkey infrastructure, irrigation automation, real-time data acquisition systems (RTDAS), and defense security projects for central and state government agencies, public sector units (PSUs), and state departments, all dealings are monitored under maximal scrutiny.

- Employees are strictly barred from extending any financial favors, private travel hospitality, or personalized benefits to any public servant, tender committee member, technical evaluator, or administrative official.
- Attempting to secure unauthorized, non-public procurement-sensitive data or pre-award source selection parameters regarding ongoing or upcoming public tenders is explicitly illegal.

C. Facilitation Payments

BIPS does not condone, permit, or pay any "facilitation payments" or grease money. These refer to unofficial fees paid to low-ranking administrative clerks or government field employees to expedite, bypass, or secure routine, non-discretionary bureaucratic actions, including the rapid clearing of operational permits, software licensing approvals, equipment inspection clearances, or site entry permissions.

D. Political Contributions & Endorsements

BIPS enforces a complete ban on institutional political involvement. No corporate funds, computing equipment, software assets, field vehicles, or company facilities shall be donated, lent, or utilized to support any active political party, candidate campaign, or political action committee, to guarantee that no business operations are perceived as buying political leverage.

4. Controlled Framework: Corporate Gifts, Hospitality & CSR

A. Gifts & Business Hospitality Rules

While the exchange of standard, low-value promotional items during major national festivals or normal corporate hospitality is standard, it must remain strictly within boundaries:

- **Acceptable Boundaries:** Items like company-branded calendars, diaries, pens, laptop sleeves, or low-cost corporate mementos are allowed, provided they have no cash trade value.

BIPS SYSTEMS LIMITED

Regd. Office : E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024 Ph.: +91-11-26483817, 26212946 Mob.: 9873199001
Branch Off. : 1/6, 1st Floor, Gokhle Marg, Opp. Red Hill School, Lucknow - 226001, (U.P.) Ph.: +91-522-4000310
Works : Khasra No.1252, Delhi Saharanpur Road, Baghpat - 250609, (U.P.) Ph.: +91-9289477297, 9289477293
E-mail : sales@bipssystems.com, support@bipssystems.com
Website : www.bipssystems.com **CIN** : U74999DL1991PLC046556



- **Monetary Thresholds & Reporting Matrix:**

- **Below ₹1,500:** Allowed without a formal compliance declaration, provided the gift is an infrequent promotional item.
 - **From ₹1,500 to ₹5,000:** Permitted only after notifying the immediate Line Manager via email within 48 hours of exchange.
 - **Above ₹5,000:** Deemed excessive and strictly prohibited unless the employee obtains explicit, written approval from the Corporate Compliance Officer prior to acceptance or distribution.
- **Exclusion Period:** Exchanging gifts with any external client or subcontractor is completely blocked while an active tender evaluation, contract renegotiation, or financial auditing phase is ongoing.

B. Corporate Social Responsibility (CSR) & Charity Oversight

BIPS administers corporate social responsibility initiatives focused on education and community skill building. Employees must ensure that charitable actions are never structured to bypass anti-corruption parameters. All corporate donations or philanthropic spending must be authorized directly by the Board of Directors, thoroughly audited, and accompanied by transparent legal documentation to ensure they are not used as a channel to conceal or facilitate an act of bribery.

5. Mandatory Anti-Corruption Training & Communication

A. Training Program Framework

To ensure that all employees understand and adhere to the compliance standards, the Company mandates a formal **Anti-Bribery and Anti-Corruption (ABAC) Training Program**:

- **Onboarding Induction:** Every newly hired employee, technical professional, and site engineer must undergo mandatory ABAC training as part of their initial onboarding induction before joining active operations.
- **Regular Refresher Courses:** All existing workforce members across all office locations, assembly system houses, and active project sites must complete a formal ABAC refresher course on an annual basis to stay informed on updated laws and corporate compliance standards.
- **Targeted Core Training:** Advanced, specialized training modules will be administered to high-risk departments—specifically the Procurement Team, Tendering Division, Sales and Marketing Unit, Government Liaison Desk, and Site Project Operations Managers—focusing on spotting, documenting, and refusing corruption risks.

BIPS SYSTEMS LIMITED

Regd. Office : E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024 Ph.: +91-11-26483817, 26212946 Mob.: 9873199001
Branch Off. : 1/6, 1st Floor, Gokhle Marg, Opp. Red Hill School, Lucknow - 226001, (U.P.) Ph.: +91-522-4000310
Works : Khasra No.1252, Delhi Saharanpur Road, Baghpat - 250609, (U.P.) Ph.: +91-9289477297, 9289477293
E-mail : sales@bipssystems.com, support@bipssystems.com
Website : www.bipssystems.com **CIN** : U74999DL1991PLC046556



B. Direct Stakeholder Communication

- **External Partner Mandate:** BIPS' zero-tolerance attitude toward bribery and corruption must be clearly communicated to all suppliers, sub-contractors, system integrators, and channel partners at the very outset of business relations.
- **Contractual Integration:** Copy or structural reference to this ABAC policy must be attached directly to every vendor onboarding document, purchase order, and master service agreement to ensure external alignment.

6. Financial Integrity, Slush Funds, and Auditing Protocols

To ensure full prevention and detection of unethical corporate conduct, BIPS implements ironclad financial controls:

- **Perfect Accounting Accuracy:** Every transaction, asset acquisition, liability, software license order, and subcontractor expense must be logged accurately in our financial databases.
- **Ban on Slush Funds:** Setting up, managing, or transacting via undisclosed, unrecorded "off-the-books" accounts or dark funds for any purpose is illegal.
- **No Artificial Channel Stuffing:** Placing artificial orders or altering financial invoices to engineer hidden margins or unapproved discounts—with the underlying intent to reward internal employees, client technicians, or third-party intermediaries—is strictly prohibited.
- **Regular Compliance Audits:** All internal financial ledgers, operational cost files, and third-party contract files are subject to surprise internal and independent external compliance audits.

7. Due Diligence on Vendors & Third Parties

BIPS can be held legally accountable for corrupt acts committed by external entities working under our umbrella. Therefore:

- All critical third-party vendors, sub-contractors, and channel partners must undergo anti-bribery due diligence and compliance onboarding reviews before contract execution.
- Every procurement or joint-venture agreement signed by BIPS must contain mandatory anti-corruption covenants, giving the Company the unilateral right to audit the partner's records and instantly terminate the arrangement upon evidence of bribery.

BIPS SYSTEMS LIMITED

Regd. Office : E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024 Ph.: +91-11-26483817, 26212946 Mob.: 9873199001
Branch Off. : 1/6, 1st Floor, Gokhle Marg, Opp. Red Hill School, Lucknow - 226001, (U.P.) Ph.: +91-522-4000310
Works : Khasra No.1252, Delhi Saharanpur Road, Baghpat - 250609, (U.P.) Ph.: +91-9289477297, 9289477293
E-mail : sales@bipssystems.com, support@bipssystems.com
Website : www.bipssystems.com **CIN** : U74999DL1991PLC046556



8. Whistleblowing Mechanism & Ironclad Protection

A. Reporting Obligations

If any executive, technical engineer, site supervisor, or external partner detects, suspects, or receives an improper request for a bribe, kickback, or illegal financial favor, they are required to escalate the incident immediately to the internal compliance authorities.

B. Dedicated Channels

Reports can be logged securely via:

- **Secure Corporate Compliance Email:** compliance@bipssystems.com
- **Mailing Desk:** Corporate Compliance Desk, BIPS Systems Limited, Head Office, New Delhi.

C. Absolute Whistleblower Protection

BIPS guarantees total confidentiality for any reporter who registers a potential compliance risk or reporting concern in good faith. The Company enforces a zero-retaliation stance. Any supervisor or manager who attempts to terminate, demote, threaten, harass, or discriminate against an employee for reporting an issue in good faith or for actively refusing a bribe will face swift corporate dismissal.

9. Strict Enforcement, Disciplinary Frameworks & Penalties

Compliance with this ABAC Policy is an integral requirement of employment and partnership at BIPS.

- **Internal Consequences:** Any internal employee found guilty of engaging in corrupt practices, facilitating kickbacks, or deliberately filing false reports will face maximum disciplinary penalties, up to and including **immediate termination for gross misconduct** without notice or severance benefits.
- **External Consequences:** Any sub-contractor, consultant, or third party found violating this policy will face immediate termination of all execution agreements with BIPS, structural cancellation of pending fees, and comprehensive blacklisting from future corporate contracts.
- **Legal Remedies:** BIPS reserves the right to report all such offenses directly to state law enforcement, the Central Vigilance Commission (CVC), or the police for formal criminal prosecution under the Indian Penal Code and the Prevention of Corruption Act.

10. Policy Maintenance & Annual Acceptance

The Corporate Compliance Officer is tasked with monitoring the dynamic execution of this policy, updating it to align with new legal developments, and documenting successful training turnouts. All employees are required to review this document and sign an **Annual Compliance Acknowledgement** confirming strict adherence to these rules.

BIPS SYSTEMS LIMITED

Regd. Office : E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024 Ph.: +91-11-26483817, 26212946 Mob.: 9873199001
Branch Off. : 1/6, 1st Floor, Gokhle Marg, Opp. Red Hill School, Lucknow - 226001, (U.P.) Ph.: +91-522-4000310
Works : Khasra No.1252, Delhi Saharanpur Road, Baghpat - 250609, (U.P.) Ph.: +91-9289477297, 9289477293
E-mail : sales@bipssystems.com, support@bipssystems.com
Website : www.bipssystems.com **CIN :** U74999DL1991PLC046556



ANNUAL COMPLIANCE ACKNOWLEDGEMENT FORM

I, _____, employee ID _____, currently designated as _____ at BIPS Systems Limited, do hereby solemnly declare that I have received, thoroughly read, and completely understood the clauses of the Corporate Anti-Bribery & Anti-Corruption Policy.

I agree to attend all mandatory training programs, abide by all its regulations throughout my tenure, and understand that any infraction on my part will lead to immediate disciplinary actions, terminating my employment for gross misconduct alongside potential criminal prosecution.

Employee Signature: _____

Date: _____

Work Location: _____

BIPS SYSTEMS LIMITED

Regd. Office : E-261, Amar Colony, Lajpat Nagar-IV, New Delhi-110024 Ph.: +91-11-26483817, 26212946 Mob.: 9873199001
Branch Off. : 1/6, 1st Floor, Gokhle Marg, Opp. Red Hill School, Lucknow - 226001, (U.P.) Ph.: +91-522-4000310
Works : Khasra No.1252, Delhi Saharanpur Road, Baghpat - 250609, (U.P.) Ph.: +91-9289477297, 9289477293
E-mail : sales@bipssystems.com, support@bipssystems.com
Website : www.bipssystems.com **CIN** : U74999DL1991PLC046556