

ANTI-BRIBERY & ANTI-FRAUD

COMPLIANCE LETTER

ISSUED FOR EXIMPRO GROUP

GST: 27CIVPS2918E1ZQ

This Anti-Bribery & Anti-Fraud Compliance Letter (**“Agreement”**) dated 20-11-2025, is established to set out the mandatory legal, ethical, and operational standards that the Party must follow to ensure strict compliance with the **UK Bribery Act 2010, EU Anti-Corruption Frameworks**, and all applicable international anti-corruption, anti-fraud, and financial-integrity requirements.

This document formalizes the commitment of **EXIMPRO GROUP**, having its registered address at **GAT NO.4780/15 PLOT NO.9, TIRANGA NAGAR, ISBAVI, PANDHARPUR, SOLAPUR, MAHARASHTRA, INDIA 413304**, to preventing bribery, corruption, fraud, improper financial practices, and unethical conduct, and ensures that all business operations, transactions, and relationships conducted by **EXIMPRO GROUP** adhere to the highest standards of transparency, integrity, and lawful practice.

PURPOSE (ANTI BRIBERY & ANTI FRAUD)

The purpose of this **Anti-Bribery & Anti-Fraud Compliance Letter** is to formally establish and affirm the Company's binding obligations to implement, uphold, and enforce comprehensive measures to prevent, detect, report, and remediate all forms of bribery, corruption, facilitation payments, financial fraud, unethical inducements, and improper financial practices.

This clause ensures that all business activities undertaken by the Company are conducted in accordance with the highest standards of integrity, transparency, and legal compliance, in alignment with the **UK Bribery Act 2010, EU Anti-Corruption Frameworks**, and all other applicable international anti-corruption and anti-fraud regulations.

DEFINITIONS (COMPLIANCE LETTER)

Anti-Bribery & Anti-Fraud Compliance Letter, the defined terms below apply and shall be interpreted in accordance with international anti-corruption standards.

1. **“Bribery”**

“Bribery” shall mean the offering, promising, giving, requesting, agreeing to receive, or accepting of any financial or non-financial advantage with the purpose or effect of improperly influencing, or attempting to influence, the actions, decisions, or responsibilities of any person. This definition includes both direct and indirect acts, and any form of inducement that results in an undue or unethical outcome.

2. **“Fraud”**

“Fraud” shall mean any intentional act or omission involving deception, misrepresentation, concealment, falsification, or abuse of position undertaken to obtain unlawful, improper, or unauthorised benefit for oneself or for another party. This definition encompasses fraudulent documentation, false statements, diversion of assets, manipulation of financial information, or any similar misconduct.

3. **“Corruption”**

“Corruption” shall mean the abuse or misuse of entrusted power, authority, or duty for private, personal, organisational, or financial gain. For the avoidance of doubt, this term includes bribery, embezzlement, collusion, extortion, kickbacks, nepotism, favouritism, and any conduct that undermines integrity, transparency, or lawful business practices.

4. **“Facilitation Payment”**

“Facilitation Payment” shall refer to any unofficial, informal, or otherwise improper payment irrespective of value made to expedite, secure, or influence the performance of routine governmental or administrative actions. Such payments are strictly prohibited under this Letter, without exception, regardless of local custom, practice, or expectation.

5. **“Public Official”**

“Public Official” shall mean any individual who holds or performs a public function, whether appointed or elected, including any officer, employee, agent, or representative of a government, governmental department, regulatory authority, public institution, state-owned enterprise, or international organisation. This term shall further include any person acting in an official or quasi-official capacity on behalf of such bodies.

6. **“EU Anti-Corruption Framework Standards”**

“EU Anti-Corruption Framework Standards” shall mean all applicable European Union statutes, directives, regulations, compliance frameworks, and supervisory requirements relating to transparency, anti-bribery enforcement, fraud prevention, anti-money-laundering controls, and ethical conduct in international trade and financial operations. The company shall expressly acknowledge and undertake to ensure full compliance with such standards to the extent applicable to their business activities.

CORPORATE COMMITMENT OF EXIMPRO GROUP

EXIMPRO GROUP hereby adopts a zero-tolerance policy toward all forms of bribery, corruption, and fraud, and commits to full compliance with applicable international anti-corruption and anti-fraud standards.

The Company shall not:

Offer, promise, give, request, or accept any bribe, kickback, or improper advantage.
Engage in fraud, deception, forgery, misrepresentation, or any unlawful gain.
Make or accept facilitation payments, irrespective of local customs or practices.
Provide or receive gifts, hospitality, or benefits intended to influence decision-making.
Participate in money laundering, concealment of improper payments, or undisclosed transactions.
Manipulate, falsify, or alter any financial records, invoices, statements, or trade documents.
Use intermediaries, agents, or third parties to carry out activities that the Company itself is prohibited from undertaking.

EXIMPRO GROUP commits to conducting all business and international trade activities with integrity, transparency, and ethical compliance.

COMPLIANCE WITH THE UK BRIBERY ACT 2010

The Company acknowledges its commitment to full compliance with the UK Bribery Act 2010 and agrees to implement, apply, and maintain the Act's six recognised principles of effective anti-bribery compliance. These principles guide the Company's conduct and internal controls across all business activities.

Accordingly, the Company shall ensure the following:

Proportionate Procedures

The Company shall maintain prevention procedures that are proportionate to its operational risks, business scale, and nature of activities.

Top-Level Commitment

Senior management shall demonstrate clear, active, and continuous commitment to preventing bribery and promoting a culture of integrity.

Risk Assessment

The Company shall conduct regular, documented assessments to identify, evaluate, and manage bribery and corruption risks.

Due Diligence

Appropriate due diligence shall be applied to business partners, agents, intermediaries, and high risk transactions.

Communication and Training

The Company shall ensure internal communication, employee awareness, and targeted training to reinforce anti-bribery obligations.

Monitoring and Review

Anti-bribery procedures shall be periodically monitored, reviewed, and improved to maintain ongoing compliance with statutory requirements.

COMPLIANCE WITH EU ANTI-CORRUPTION FRAMEWORKS

The Company undertakes to fully comply with all applicable EU Anti-Corruption Frameworks and related regulatory standards governing transparency, financial integrity, and anti-fraud controls. This includes adherence to EU-mandated anti-fraud measures applicable to procurement, supply-chain operations, and cross-border trade ensuring complete accuracy, integrity, and transparency in all accounting and financial reporting practices fulfilling all Anti-Money Laundering (AML) obligations through proper verification, monitoring, and reporting mechanisms and complying with mandatory reporting requirements in the event of any detected or suspected improper, unethical, or unlawful conduct. The Company reaffirms its commitment to uphold these standards across all business operations, internal processes, and international transactions.

GOVERNANCE, AUDIT & COMPLIANCE OVERSIGHT

The Company shall establish, implement, and continuously maintain robust governance and oversight mechanisms to ensure full adherence to the anti-bribery, anti-corruption, and anti-fraud obligations set forth under this Compliance Letter. The Company shall conduct periodic and independent internal audits, structured risk assessments, and ongoing monitoring of all financial records, transactions, and business processes for the purpose of detecting, preventing, and addressing any irregularities or non-compliant conduct. Senior management shall exercise clear, demonstrable, and active oversight, ensuring that all compliance frameworks, controls, and safeguards remain effective, enforceable, and aligned with applicable international legal and regulatory standards.

WHISTLEBLOWING, REPORTING & NON-RETALIATION PROTECTIONS

The Company shall maintain secure, confidential, and legally compliant whistleblowing and reporting mechanisms to enable employees and external stakeholders to report, in good faith, any suspected misconduct, bribery, corruption, fraud, or unethical activity. All whistleblowers shall be afforded full protection under a strict non-retaliation policy, and no individual shall suffer dismissal, discrimination, or any form of adverse treatment for raising concerns. The Company further commits to providing formal training, compliance awareness programs, and clear reporting protocols to ensure that all personnel understand their obligations and rights under this Letter, thereby promoting a culture of transparency, accountability, and lawful conduct.

DECLARATION AND CONDITIONS

By issuing and accepting this **Anti-Bribery & Anti-Fraud Compliance Letter**, the Company hereby declares that it fully understands, accepts, and agrees to be bound by the obligations, standards, and prohibitions contained herein. The Company acknowledges that these requirements constitute binding conditions applicable to all business activities, transactions, and representations undertaken by or on behalf of the Company. The Company further affirms its commitment to comply with all relevant international and domestic anti-bribery, anti-corruption, and anti-fraud laws, and agrees that any breach of these obligations shall be treated as a material violation subject to appropriate disciplinary, contractual, or legal consequences. The Company undertakes to ensure that all employees, officers, agents, and third-party representatives are made aware of and adhere to these requirements, thereby maintaining the integrity, transparency, and lawful conduct expected under this Compliance Letter.

This Compliance Letter is issued to **EXIMPRO GROUP (the "Company")** in recognition of its commitment to maintain full compliance with all applicable anti-bribery, anti-corruption, and anti-fraud obligations.

ACCEPTANCE & AUTHORIZATION

By executing this Anti-Bribery & Anti-Fraud Compliance Letter, the Company hereby formally acknowledges, accepts, and commits to the full adoption and enforcement of all anti-bribery, anti-corruption, and anti-fraud obligations, standards, and procedures set forth herein. The Company further undertakes that these obligations shall be binding upon its operations, officers, employees, agents, and relevant third parties, and shall be applied consistently to ensure compliance with all applicable legal, regulatory, and ethical requirements.

IN WITNESS WHEREOF, **EXIMPRO GROUP (the "Company")**, through its authorised representative, executes this Letter, fully accepting and binding itself to all obligations herein.

AUTHORIZED SIGNATURE

For and on behalf of EXIMPRO GROUP, Director and Authorised Signatory
THE COMPANY (EXPORTER)

Sawant S. G.




ABAF/UKBA2010-EUACF/2025/012

MR. SAGAR GORKSHNATH SAWANT

HEREBY CERTIFIED

DIGI GLOBAL WEB SOLUTIONS	
OFFICIAL DECLARATION	
DIGI GLOBAL WEB SOLUTIONS, HEREBY DECLARES THAT THIS LETTER/AGREEMENT IS DULY VERIFIED AND ASSURED.	
THIS DECLARATION IS VALID FOR ALL TRANSACTIONS AND AGREEMENTS EXECUTED BETWEEN THE PARTIES DURING THE FISCAL PERIOD 2025-2026.	
AUTHORIZED BY:	
For DIGI GLOBAL WEB SOLUTIONS Digi Global Web Solutions	

