

# **Creative Graphics Group**

## **Anti-Bribery and Anti-Corruption Policy**

Review Date	Version	Reviewed by	Approved by
06 <sup>th</sup> August, 2025	1.0	Senior Management	Board of Directors

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## 1. Preamble

Creative Graphics Group (“the Company”) maintains a zero-tolerance approach towards bribery and corruption and is committed to conducting all its business activities with integrity and ethical transparency. The Company believes that ethical business practices and fair dealings are the foundation of its reputation and long-term success. Accordingly, the Company strictly prohibits any form of bribery, facilitation payments, kickbacks, or other corrupt practices.

The Company upholds the highest standards of corporate governance and ensures that every decision, transaction, and relationship reflects honesty, accountability, and fairness.

## 2. Purpose

The purpose of this Policy is:

- To outline the Company’s responsibilities and commitment to comply with all applicable laws and regulations relating to anti-bribery and anti-corruption.
- To guide all employees, directors, and associated persons to act ethically and professionally in every business relationship and to avoid any conduct that could be perceived as corrupt or improper.
- To promote a transparent culture that prevents and deters bribery and corruption at all levels.

## 3. Scope

This Policy applies to:

- All employees of Creative Graphics Group at all levels and functions, including directors, senior management, and officers;
- Permanent, temporary, contract, and part-time employees.

All individuals are expected to adhere strictly to this Policy regardless of location or position.

## 4. Third-Party Compliance

While this Policy primarily applies to employees, Creative Graphics Group also expects that its consultants, contractors, vendors, suppliers, service providers, agents, and other third parties acting on behalf of the Company will adhere to similar anti-bribery and anti-corruption standards.

## 5. Definitions

- **Bribe/Bribery:** Offering, giving, soliciting, promising, or receiving anything of value to influence the actions or decisions of another person in breach of law or duty.
- **Corruption:** Misuse of entrusted power for private or business gain.
- **Fee Payment:** A fixed or agreed payment made in exchange for a legitimate service. It includes costs, charges, commissions, or statutory fees and must be transparent and justifiable.
- **Gift and Hospitality:** Anything of value offered or received as a gesture of goodwill, including tangible or intangible benefits such as gifts, discounts, meals, entertainment, accommodation, or event invitations.
- **Policy:** Refers to this Anti-Bribery and Anti-Corruption Policy (“ABAC Policy”).

## 6. Forms of Bribery

The Company recognises that bribery and corruption can occur in many forms. The following areas are identified as potential risk zones requiring strict vigilance:

### 6.1 Fee Payments

All payments made by the Company shall be bona fide and duly supported by documentation. The Company shall ensure that all payments comply with applicable laws, accounting standards, and internal controls. Any related party transaction shall adhere to the Companies Act, 2013 and SEBI (LODR) Regulation, 2015 and must be approved through the proper governance process.

### 6.2 Offers of Employment

The Company follows a fair, transparent, and merit-based recruitment process. No preferential treatment will be given to candidates based on personal relationships or influence. Appointments shall strictly depend on qualifications, experience, and suitability for the role.

### 6.3 Charitable Contributions and Sponsorships

While the Company may contribute to charitable causes as part of its Corporate Social Responsibility (CSR) initiatives, all such contributions must be lawful, transparent, and approved by the appropriate authority. Donations or sponsorships should never be used as a means to obtain business advantage or influence.

## **6.4 Gifts and Hospitality**

Gifts and hospitality, if excessive or frequent, may create a conflict of interest or the perception of impropriety. Employees are prohibited from offering or accepting any gift, favour, or hospitality exceeding ₹7,500 (or equivalent) in value from any current or potential client, vendor, or service provider without prior written approval. Cash gifts, vouchers, or equivalent monetary benefits are strictly prohibited.

## **6.5 Political Donations**

Political donations or contributions on behalf of the Company, whether monetary or in-kind, must be transparent, pre-approved, and compliant with applicable laws. This Policy does not restrict employees from making personal political contributions in their private capacity.

## **7. Protection / No Retaliation**

The Company assures that no employee or stakeholder shall suffer retaliation or any adverse consequence for refusing to engage in bribery or for reporting suspected misconduct in good faith. Any act of retaliation, intimidation, or harassment against whistleblowers will be treated as misconduct and will attract disciplinary action.

## **8. Disciplinary Action for Non-Compliance**

Non-compliance with this Policy is a serious offence and may result in one or more of the following disciplinary measures:

- Formal written warning or apology;
- Withholding of promotion or salary increment;
- Demotion or reassignment;
- Termination of employment or contract;
- Legal proceedings and notification to authorities, where required.

## **9. Monitoring and Review**

The Company reserves the right to review and amend this Policy periodically to ensure its continued relevance and effectiveness. All amendments shall be approved by the Board of Directors.

## 10. Communication and Awareness

The Company promotes a culture of integrity by:

- Including this Policy within the Code of Conduct documentation signed by all employees;
- Circulating updates and conducting awareness sessions to reinforce anti-bribery and anti-corruption practices.

Employees are encouraged to report any violation or concern to the Compliance Officer via email at: **cs@creativegraphics.net.in**.

Reports will be treated confidentially, and anonymity will be respected wherever possible.

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