



Anti-Bribery and Anti-Corruption Policy

DART Info Services Private Limited, Bangalore

Jan 1, 2015

This Policy is applicable to every employee of DART Info Services Private Limited (DART) or its subsidiaries, including senior officers, and to members of the DART Board of Directors. The reporting requirement of this Policy is also applicable to DART's contractors and suppliers. The Company is committed to acting lawfully and with integrity in every aspect of its business. Consistent with that commitment, the Company has introduced this Anti-Corruption/Anti-Bribery Policy.

1. PURPOSE

DART together with its subsidiaries are committed to conducting our business in accordance with all applicable laws, rules and regulations including the laws of Prevention of Corruption Act (India), and local anti-bribery or anti-corruption laws that may be applicable according to country of operations.

For the purposes of this Policy, a "contractor", "supplier" or "third party" is defined as an entity or individual who provides, and receives payment for, services or goods related to any aspect of DART operations, and includes consultants and subcontractors. This Policy is intended to assist in conducting our business legally, ethically and with integrity. It is not meant to stop legitimate business activities so long as those activities comply with the law and with the Company's internal policies.

2. SCOPE

This Policy is applicable to every employee of DART, including senior officers, and to members of DART. The reporting requirement of this Policy is also applicable to DART's contractors and suppliers. This Policy is intended to supplement all applicable laws, rules, and other corporate policies and is not intended to supplant any local laws.

3. DEFINITION

Corruption is the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of any sort of pecuniary advantage to the beneficiary.



4. POLICY REQUIREMENTS

DART personnel and agents are strictly prohibited from offering, paying, promising, or authorizing any payment or other thing of value to any person in authority or fiduciary status both in government and non-government organizations, directly or indirectly through or to a third party for the purpose of causing the person to act or fail to act in violation of defined duties, causing the person to abuse or misuse their position; or securing an improper advantage, contract or concession for DART or any other party.

DART personnel shall ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company's books and records. DART will institute detailed procedures and standards related to training, due diligence, the recording of transactions, and other areas, to implement the terms of this Policy. In particular, DART will follow standards and procedures for sponsoring any sort of facilities to any government or public authorities or persons in fiduciary status.

5. AUDITS

Audits of DART sites, operating units, and contractors may be conducted periodically to ensure that the requirements of this Policy and applicable procedures and guidelines are being met. Audits may be conducted internally by DART, or externally by retained third parties.

6. WAIVER

There is no permitted deviation or waiver from this Policy.

7. DISCIPLINE

Any employee who violates the terms of this Policy will be subject to disciplinary action and will be treated as misconduct as defined by DART Office Rules. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to DART management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

8. Contact

If you have any questions about this Policy, please feel free to contact us through our website or write to us at Policy Division, DART Info. Services Private Limited, 3rd floor, # 2, 27th Main Road, HSR Sector - I, Bangalore 560102, India or send email to info@dartinfo.co.in.