



D-101, Silver Tower, Thakur Complex, Kandivali (East), Mumbai - 400 101. India
Office:- +91-98929 09044 Email :- deepak@silversnow.in, Website :- www.silversnow.in

Date :- 14th August, 2022

Anti-Bribery and Anti-Corruption Policy

1. Introduction

Silver Snow (India) Pvt. Ltd. (hereinafter referred to as "the Company") is committed to conducting its business with the highest standards of integrity and professionalism. This Anti-Bribery and Anti-Corruption (ABAC) Policy is designed to ensure that all employees, directors, and third parties acting on behalf of the Company adhere to these principles and comply with all applicable anti-bribery and anti-corruption laws and regulations, including the Prevention of Corruption Act, 1988 in India.

2. Scope

This policy applies to all employees, directors, agents, consultants, contractors, and any other parties acting on behalf of the Company, including third parties and joint venture partners.

3. Policy Statement

The Company strictly prohibits all forms of bribery and corruption. This includes offering, giving, soliciting, or receiving any form of bribe, kickback, or improper payment or benefit to influence or obtain business advantages.

4. Definitions

Bribe: Any financial or non-financial advantage offered, promised, or given to induce or reward improper performance of a function or activity. Corruption: Abuse of power or position for personal gain or advantage.

5. Prohibited Conduct

Bribery: No employee or associated person may offer, give, or receive bribes or kickbacks, whether directly or indirectly.

Facilitation Payments: Payments made to expedite or secure the performance of a routine government action are prohibited.



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Gifts and Hospitality: Gifts or hospitality may only be offered or accepted if they are modest, reasonable, and in line with local customs and regulations. Any gift or hospitality exceeding INR 10,000 must be reported to the compliance officer.

Charitable Contributions and Sponsorships: Must not be used as a cover for bribery. Contributions should be transparent and made to legitimate charities or causes.

6. Compliance and Reporting

Compliance Officer: The Company has appointed a Compliance Officer responsible for overseeing the implementation of this policy and addressing any concerns related to bribery and corruption.

Reporting: Employees are encouraged to report any concerns or violations of this policy through the Company's designated whistleblowing channels. Reports will be treated confidentially and investigated thoroughly.

Training: All employees will receive regular training on this policy to ensure understanding and compliance.

7. Monitoring and Review

The Company will conduct regular reviews and audits to ensure adherence to this policy and to identify any areas of improvement. Any breaches will result in disciplinary action, which may include termination of employment.

8. Enforcement

Violations of this policy will result in disciplinary action up to and including termination of employment or contractual agreements. The Company will cooperate with law enforcement agencies in investigating any violations.

9. Policy Amendments

This policy may be amended from time to time to ensure compliance with legal requirements and best practices. Employees will be notified of any significant changes.



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10. Approval and Implementation

This policy has been approved by the Board of Directors of Silver Snow (India) Pvt. Ltd. and is effective as of 14th August, 2022.

Best Regards.

For Silver Snow (India) Private Limited

Mr. Deepak Nathwani – CEO
M:- +91-98679 23300

For Silver Snow (India) Private Limited

Purav Deepak Nathwani - Director

For Silver Snow (India) Private Limited

Shruti Rajesh Gawde - Director