

PUBLIC DOCUMENT GOVERNANCE & COMPLIANCE

DATATOBIZ PRIVATE LIMITED

Anti-Bribery & Anti-Corruption Policy and Supplier Code of Conduct

Document Version 1.0

Policy Origination Date: April 1, 2025

Last Reviewed: April 1, 2026

Next Review: April 1, 2027

Document Control

This document sets out DataToBiz Private Limited's ("DataToBiz," "we," "us," or "our") policy on the prevention of bribery and corruption, and the standards of conduct we require from every supplier, contractor, and partner in our value chain. It applies across the geographies where DataToBiz operates and delivers for clients: the US & Canada, the UK & Europe, the Middle East, Australia, and India.

Document title	Anti-Bribery & Anti-Corruption Policy and Supplier Code of Conduct
Document owner	DataToBiz Leadership Team — Ankush Sharma (Co-Founder & CEO) and Parindsheel Singh Dhillon (Co-Founder)
Applies to	All DataToBiz employees, contractors, and third parties; all suppliers, vendors, and subcontractors engaged by DataToBiz
Classification	Public — published at www.datatobiz.com
Version	1.0
Policy origination date	April 1, 2025
Last reviewed	April 1, 2026
Next review	April 1, 2027

Revision History

Version	Details	Effective Date
1.0	First release	April 1, 2025

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PART ONE: Anti-Bribery & Anti-Corruption Policy

Our zero-tolerance stance on bribery and corruption

1. Introduction

It is DataToBiz's policy to conduct business ethically and to prohibit bribery and corruption in any part of our operations. This Anti-Bribery & Anti-Corruption (ABAC) Policy guides our employees and third parties toward compliance with the Prevention of Corruption Act, 1988 of India, and, given the geographies our clients operate in, the U.S. Foreign Corrupt Practices Act of 1977 and the UK Bribery Act, 2010. Where local law sets a higher standard than this Policy, the local law takes precedence. This Policy is administered jointly by DataToBiz's co-founders, Ankush Sharma and Parindsheel Singh Dhillon, pending a dedicated Ethics & Compliance function as we scale.

2. Who This Policy Covers

This Policy applies to every DataToBiz employee — permanent, fixed-term, or trainee — across our India headquarters and any location where we engage people on-site for client delivery. It equally covers third parties acting on our behalf, including consultants, agents, contractors, subcontractors, and suppliers.

3. What Counts as Bribery or Corruption

A bribe is any money, gift, or thing of value offered, promised, given, or received — directly or through a third party — to improperly influence a business decision, secure an undue advantage, or obtain or retain business. This includes payments to government officials and commercial bribery between private parties. The mere offer or promise of an improper payment is a violation, whether or not the payment is ultimately made or has the intended effect.

4. Prohibited Conduct

DataToBiz employees and anyone representing DataToBiz are strictly prohibited from:

Giving bribes — offering, promising, giving, or authorizing any bribe or corrupt payment to obtain or retain business or any improper advantage.

Receiving bribes — soliciting or accepting any bribe or corrupt payment in return for providing DataToBiz business or any other advantage.

Facilitation payments — payments made to speed up a routine government action are prohibited outright, with no exceptions.

Indirect payments — using intermediaries, inflated invoices, fake consultancy arrangements, or off-book accounts to channel an improper payment.

5. Gifts, Entertainment & Hospitality

Modest, transparent gifts and hospitality that reflect ordinary business courtesy are acceptable. Anything beyond that is not.

Gifts — gifts to or from non-government business contacts are acceptable only if nominal in value — up to USD 100 per individual or entity per year — and given in circumstances that are customary and culturally appropriate (for example, festivals). Cash, gift cards, and other cash-equivalent gifts are never acceptable.

Gifts to government officials — gifts to or from government officials are limited to customary festival sweets of nominal value, capped at USD 50. No other gifts to government officials are permitted.

Entertainment — business meals and hospitality connected to a legitimate business purpose are acceptable if reasonable in value and provided at a proper venue. Hospitality must never be offered to secure a favour or influence a decision.

Frequency — repeated gifts or hospitality, even individually nominal, that could be seen as creating an obligation toward the giver should be avoided.

Any gift or hospitality expected to exceed these thresholds needs prior sign-off from DataToBiz's leadership before it is offered or accepted.

6. Interactions with Government Officials

Dealings with government officials call for extra care. Interactions must be open and transparent, must never involve a facilitation payment, and must never create even the appearance of seeking to improperly influence an official act, approval, or licence.

7. Engaging Third Parties

Before engaging a third party with a government-facing role — for example, a customs, licensing, or tax consultant — DataToBiz conducts proportionate due diligence on their integrity record. Contracts with such third parties include anti-bribery commitments and DataToBiz's right to end the relationship if those commitments are breached.

8. Recordkeeping

All payments and business courtesies must be accurately recorded, with a clear business purpose, amount, and recipient. Off-book accounts or undocumented payments are never permitted, regardless of the underlying transaction.

9. Reporting & Non-Retaliation

Anyone who becomes aware of a suspected bribe, corrupt payment, or breach of this Policy can report it by writing to hi@datatobiz.com. Reports made in good faith will not result in retaliation of any kind, including against an employee who refuses to pay a bribe even if that refusal costs DataToBiz business. Every report is reviewed by DataToBiz's leadership and investigated on a confidential basis.

10. Disciplinary Action

Violations of this Policy may lead to disciplinary action up to and including termination of employment or of a contractual relationship, in addition to any civil or criminal liability the individual or DataToBiz may face under applicable Anti-Corruption Laws.

11. Review

This Policy is reviewed at least annually, or sooner if our operating footprint changes materially, and is owned by DataToBiz's leadership team.

12. Approval

This Policy was approved by DataToBiz's leadership on behalf of DataToBiz Private Limited.

Ankush Sharma

Co-Founder & Chief Executive Officer, DataToBiz Private Limited | Date: April 1, 2026

Parindsheel Singh Dhillon

Co-Founder, DataToBiz Private Limited | Date: April 1, 2026

PART TWO: Supplier Code of Conduct

What we expect from every supplier in our value chain

1. Purpose

DataToBiz depends on external suppliers — cloud and software vendors, subcontracted specialist talent, and professional and facilities service providers — to operate and to deliver for our clients. We expect every supplier we work with to share our commitment to ethical, responsible business conduct. This Supplier Code of Conduct sets out that expectation.

2. Scope & Applicability

A “Supplier” means any goods supplier, service provider, software vendor, contractor, subcontractor, consultant, staffing partner, or agent that has a business or contractual relationship with DataToBiz, including their own employees, personnel, and subcontractors. This Code applies wherever DataToBiz engages a supplier — across India, the US & Canada, the UK & Europe, the Middle East, and Australia. Where national law and this Code differ, the higher standard applies; where they conflict, national law governs.

3. Labour & Human Rights

These expectations mirror the commitments in DataToBiz’s own Human Rights & Modern Slavery Statement, extended to our supply chain.

Freely Chosen Employment — forced, bonded, or involuntary labour, and human trafficking, are never acceptable at any stage of a supplier’s operations.

Child Labour — suppliers must not employ anyone below the legal minimum working age, and must ensure any young worker’s role is safe, appropriate, and compliant with local law.

Wages & Benefits — suppliers must pay at least the applicable minimum wage, communicate pay terms clearly, and compensate overtime as required by law.

Working Conditions — suppliers must provide workers with safe, clean facilities and reasonable working conditions.

Non-Discrimination & Anti-Harassment — suppliers must not discriminate in hiring or employment on any legally protected ground, and must maintain a workplace free of harassment.

Freedom of Association — suppliers must respect workers' right to freely associate and bargain collectively, without retaliation.

4. Health & Safety

Suppliers are expected to identify and address workplace health and safety hazards, provide appropriate protective equipment where needed, and maintain a system for emergency preparedness and reporting.

5. Business Ethics

Anti-Bribery & Anti-Corruption — suppliers must uphold the same zero-tolerance standard on bribery, kickbacks, and corruption that DataToBiz holds itself to under our Anti-Bribery & Anti-Corruption Policy, and must not offer gifts, cash, or favours to DataToBiz personnel intended to influence a business decision.

Conflict of Interest — suppliers must disclose any actual or potential conflict of interest between their personnel and DataToBiz without delay.

Data Privacy & Confidentiality — suppliers must protect DataToBiz's and DataToBiz clients' confidential information, personal data, and intellectual property, and apply appropriate data security measures given the nature of our data and AI work.

Use of DataToBiz's Brand — suppliers must not use DataToBiz's name, logo, or brand without prior written authorization.

6. Environmental Responsibility

As a knowledge- and technology-services business, DataToBiz's environmental footprint runs primarily through the vendors and facilities we rely on. We expect suppliers to operate efficiently, minimize avoidable waste, and responsibly manage the disposal of IT equipment and electronic waste.

7. Grievance & Reporting

Suppliers, their employees, or any other stakeholder can raise a concern, complaint, or suggestion related to this Code by writing to hi@datatobiz.com. DataToBiz protects anyone who raises a concern in good faith from retaliation.

8. Our Additional Expectations of Suppliers

conduct business with integrity in all interactions with DataToBiz.

maintain documentation sufficient to demonstrate compliance with applicable law and with this Code.

report any known or suspected violation of this Code, whether by their own organization or another party.

ensure their own subcontractors and sub-suppliers are held to the same standards set out in this Code.

9. Administration & Review

This Code is administered by DataToBiz's leadership team and is reviewed at least annually. It takes effect for a supplier upon acceptance, evidenced by that supplier's signature on the Acknowledgment below.

Acknowledgment & Acceptance

This confirms that the undersigned, on behalf of the organization named below, has received, read, and understood the requirements of this Supplier Code of Conduct and agrees to abide by them, to demonstrate how these requirements are being met on request, and to allow DataToBiz to reasonably verify compliance.

Organization name

Authorized signatory

Title / Designation

Signature

Date

Approval — DataToBiz Private Limited

This Supplier Code of Conduct was approved by DataToBiz's leadership on behalf of DataToBiz Private Limited.

Ankush Sharma

Co-Founder & Chief Executive Officer, DataToBiz Private Limited | Date: April 1, 2026

Parindsheel Singh Dhillon

Co-Founder, DataToBiz Private Limited | Date: April 1, 2026