

ANTI-TRUST AND FAIR COMPETITION POLICY

1. INTRODUCTION:

- 1.1. Sahita Human Capital Solutions Pvt Ltd (hereinafter referred to as “**Sahita**” or “**Company**”) conducts its business in compliance with all applicable Laws including The Competition Act, 2022, Rules framed thereunder including amendments thereto from time to time (hereinafter referred to as ‘Competition Laws’).
- 1.2. This policy provides guidance to Sahita as a whole about dealing with its customers, suppliers and competitors in a fair, honest manner and in compliance with the Competition Laws.
- 1.3. This policy aims to outline guidelines and principles to prevent anticompetitive behaviour and maintain a level playing field for businesses.

2. PURPOSE

- 2.1. Sahita demonstrates zero tolerance towards “unfair methods of competition” and “unfair or deceptive acts or practices”.
- 2.2. This policy provides guidance to Associates across Sahita about antitrust and competition laws and conduct business in fair, ethical and transparent manner.
- 2.3. It is important that we act professionally, fairly and with utmost integrity in all our business dealings and relationships; whenever and wherever we operate or engage with competitors, suppliers, distributors or any other members of our supply chain.

3. GOVERNANCE

- 3.1. Any changes to this policy shall be tracked and documented for future reference and all changes shall be performed only after prior approval of the Chief Compliance Officer.
- 3.2. Chief Compliance Officer shall undertake periodic review and update this policy to reflect applicable law(s) and /or latest notifications released by the regulating authorities from time to time.
- 3.3. Chief Compliance Officer shall monitor the effectiveness and review the implementation of the compliance principles set forth in this policy, regularly considering its suitability, adequacy and effectiveness

4. APPLICABILITY

This policy is applicable to all Associates (Associates means on-roll employees of all Sahita entities), Board Members, contractors, consultants, trainees, service providers of our Company and our subsidiaries, affiliates, group companies and persons or entities contractually obligated across the globe.

5. POLICY FRAMEWORK

5.1. Dealing with Competitors

- 5.1.1. In today’s marketplace, competitors interact in many ways, through trade associations, professional groups, joint ventures, standard setting organizations, and other industry groups. Sahita encourages such dealings, provided they are fair, ethical and transparent in nature.

- 5.1.2. Associates must be aware of antitrust risks in their interactions with competitors and must maintain caution at all the times during their dealings with competitors.
- 5.1.3. We must ensure that no collaboration with competitors should violate Competition Laws.
- 5.1.4. Sahita shall not, under any circumstances, engage in Price Fixing¹ with any competitor(s) or supplier(s). Sahita will establish prices and other terms on its own, without agreeing with a competitor.
- 5.1.5. Price Fixing does not relate only to prices, but also to other terms that affect prices to consumers, and therefore, we shall not disclose any such information to the competitors. This could include any matters, including but not limited to:
 - (i) Present or future prices
 - (ii) Shipping Fees
 - (iii) Warranties
 - (iv) Financing Rates
 - (v) Pricing policies
 - (vi) Promotions
 - (vii) Bids
 - (viii) Costs
 - (ix) Capacity
 - (x) Terms and conditions of sales, including credit terms
 - (xi) Discounts
 - (xii) Identity of customers
 - (xiii) Allocation of customers or sales areas
 - (xiv) Production quotas
 - (xv) R&D Plans
- 5.1.6. Competitive information and/or intelligence, must only be collected through legal and ethical means such as published news, press releases, information available in the public domain, etc.
- 5.1.7. If any unauthorized or confidential information is received about a competitor, we must not use this information and notify the Chief Compliance Officer immediately.
- 5.1.8. No Sahita Associate shall interact with persons in other entities to control or restrict production, supply and distribution of Sahita products in the market. Furthermore, any research and innovation efforts at Sahita must not be influenced by discussions with competitors, that restricts production.
- 5.1.9. Associates must never make plain agreements with competitors to divide sales territories or assign customers, as such arrangements are essentially agreements not to compete.
- 5.1.10. Associates must never coordinate or direct competitor to not undertake business with targeted individual or organization as it amounts to an illegal boycott.

5.2. Dealing with Suppliers

- 5.2.1. The Anti-trust laws also affect a variety of relationships – those involving organizations at different levels of the supply chain including but not limited to suppliers, distributors, logistics providers, third parties, business partners etc.

- 5.2.2. Sahita encourages arrangements, provided they are undertaken with an intention to reduce cost or promote efficiencies.
- 5.2.3. Associates must not enter any formal or informal agreements, with retailers, distributors or business partners, if the agreement prohibits or appear to prohibit the sale of Sahita products to certain sections or types of customers.
- 5.2.4. Associates must refrain from any vertical arrangements with any suppliers if such vertical arrangement reduces competition among organizations at the same level or prevents new organizations from entering the market.
- 5.2.5. Anti-trust issues may also arise if Sahita imposes price or non-price restraints up or down the supply chain i.e. in dealings with suppliers or dealers which could be in violation of anti-trust laws.
- 5.2.6. Sahita has a right to choose its business partners. As permitted by applicable laws, Sahita shall be entitled to enter into exclusive contracts with its Business Partners. However, Sahita Associates must refrain from any anti-competitive arrangements or agreement.

5.3. Mergers

- 5.3.1. Mergers may benefit competition and consumers by allowing organizations to operate more efficiently.
- 5.3.2. While entering mergers, Sahita shall ensure that all requirements of Anti-trust and Competition laws are fully complied. Also, Sahita shall make necessary disclosures as mandated by applicable laws and regulatory authorities while entering mergers.
- 5.3.3. Sahita prohibits mergers and acquisitions when the effect “may be substantially to lessen competition, or to tend to create monopoly.”
- 5.3.4. The principles provided above are an indicative list and not an exhaustive list of all possible scenarios which could result in violation of applicable anti-trust or competition laws. We ensure that no business practice is adopted which may be in contravention of applicable anticompetition laws and other relevant guidelines.

6. EXCEPTIONS

All exceptions to this policy must be approved by the Founder.

7. BREACH OF POLICY PRINCIPLES

Any violation of the principles set forth in this policy by any Employee may have significant consequences for the Employee and the Sahita, including potential prosecution, fines and other penalties for improper conduct, as well as imprisonment and/or disciplinary action up to and including termination.

8. AMENDMENT

The Board of Directors of the Company has right to amend or modify this Policy in whole or in part, at any time without assigning any reason, whatsoever.