



CORPORATE COMPLIANCE POLICY



SFO TECHNOLOGIES

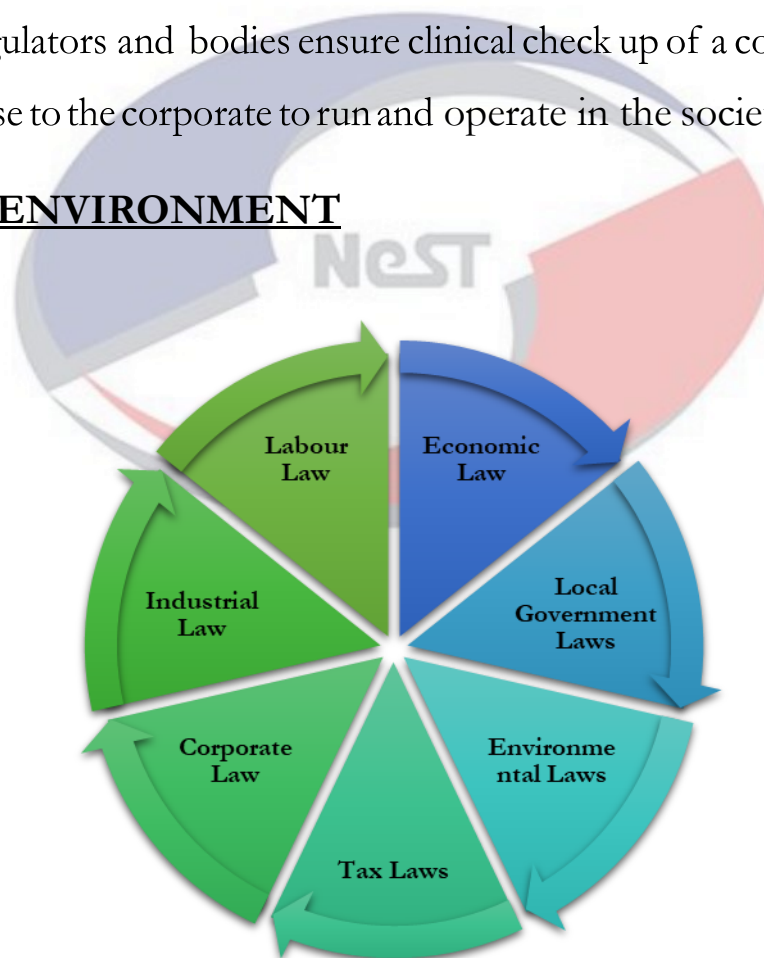
A NeST Group Company

CREATING INNOVATIVE SOLUTIONS

SFO Technologies Private Limited (SFO) is committed to being a responsible corporate citizen and respect the applicable laws and regulations. The company gives paramount importance on legal compliance and ensures their alignment with the laws of jurisdiction as well as to the territory where it operates. The company believes in complying with the laws of the land in letter and spirit and through this policy develops an internal control tool for monitoring the compliance mechanism on a real time basis.

Better compliance is always the pre-requisite for ensuring effective corporate governance in the organization. Compliance of statutes, rules and regulations, standards set by various regulators and bodies ensure clinical check up of a corporate and it confers societal license to the corporate to run and operate in the society.

THE LEGAL ENVIRONMENT

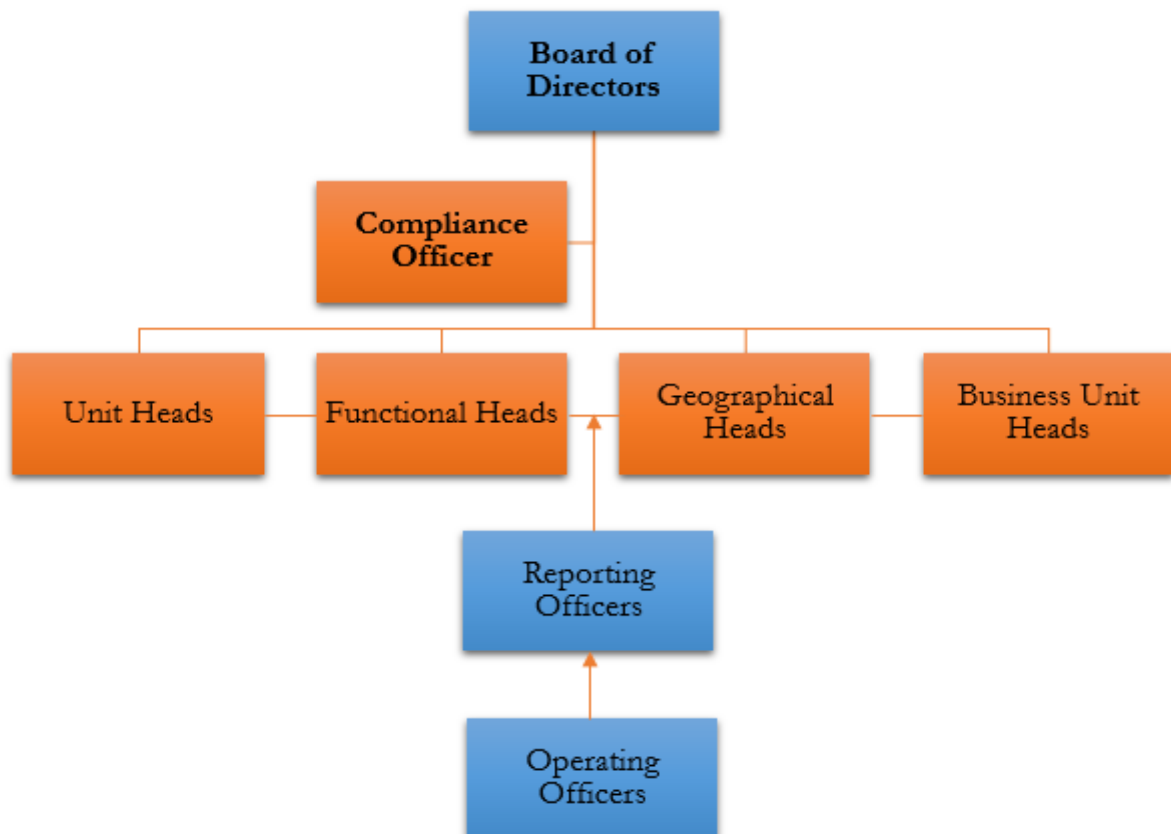


PROCESS FLOW

The Board shall periodically review the Compliance Report of all applicable laws submitted to it by the compliance team. Each Operating Officer responsible for compliance by obtaining registration, renewal of registration, periodical filing of returns etc shall submit to his / her Reporting Officer in the middle management cadre within 2 (two) weeks of every quarter, a detailed report on compliance and non-compliances, if any.

A Compliance Report is prepared by the Reporting Officers to his Unit Head, Functional Head, Geography Head and Business Head in a format, appended as Annexure 1.

Functional Head/Geography Head and / or the Unit or Business Head, as the case may be, shall submit to the Compliance Officer, a Consolidated Compliance Report for the quarter within 1 (one) week of the preceding quarter with respect to their functional area, geography or unit or business division as the case may be, in the same format as is provided in Annexure 1.



- The Operating Officers shall prepare a list of non-compliances, if any for the respective quarter and report them to their Reporting Officers within 2 weeks from the end of the quarter.
- The Reporting Officers shall within one week of report from the operating staff, counter check and forward the same along with the reasons for such non compliances, if any to the Department Heads.
- The Departmental/Unit/Geography/Business/Functional Heads shall discuss with the team in detail, the reasons of non compliances, if any and take action for rectifying the same. With their recommendation for avoiding non compliance in the future, they have to submit their report to the Compliance Officer.
- The Compliance Officer shall place the Consolidated Certificate of Compliance of the company signed by the Managing Director, Chief Financial Officer and Compliance Officer for the respective quarter along with the details of non compliances if any, the format of which is provided at Annexure 2.
- The Reporting officers shall upload the relevant forms, returns and challans, as the case may be for the respective quarters in the FTP allotted by the Compliance Team, to support the Compliance Certificates submitted to the Compliance Officer.
- The compliance calendar for the year 2021-2022 is provided at Annexure 3.

CONTACT

For enquiries and clarifications :

Mr. Padmanabhan Kumaravel

Company Secretary, SFO Technologies Private Limited

**Corporate Office, Plot No: 02 Cochin Special Economic Zone,
Kakkanad-682037, Ernakulam Kerala, India.**

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Format of the Report/Certificate to be submitted to the Compliance Officer

To,

**The Compliance Officer
SFO Technologies Private Limited**

Sub: Certificate/Report of Compliance

This is to certify that:

1. We have duly complied with the formalities under the provisions of the following Acts, Rules, including any registrations, renewals, approvals, consents and filing of different forms for the period commencing from to pertaining to SFO Technologies Private Limited, Cochin ;
2. And that all sums required to be deducted, if any, in accordance with the provisions of the said Acts/Rules have been properly deducted and that all the sums so deducted have been paid within the prescribed time to the credit of Central/State Governments.
3. And that any other statutory compliances as required under the aforementioned Acts/ Rules have been complied with except the following:

Sl No.	Form No.	Registration/Renewal/Return	Due Date of Filing	Reason for Delay if any;

Name :

Signature :

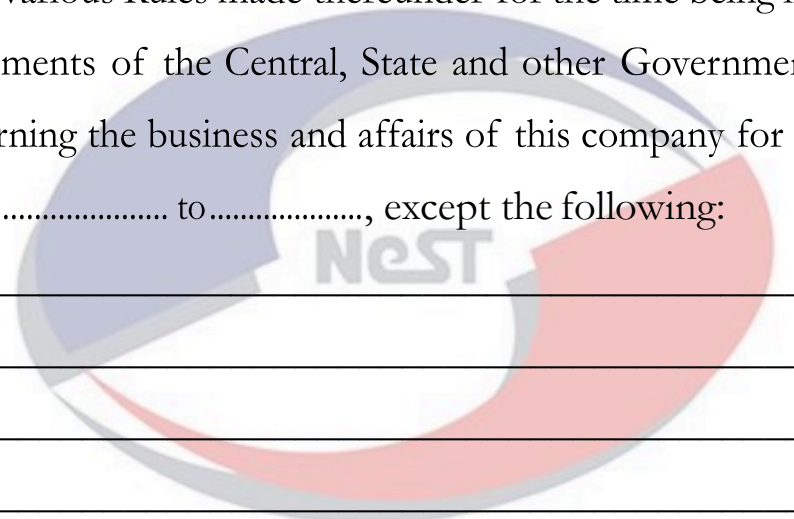
Designation :

Date :

Format of Compliance Certificate to the Board of Directors

CERTIFICATE OF COMPLIANCE

Certified that there has been due compliance with all the provisions of the applicable laws and regulations, including Tax, Labour, Industrial laws, the Companies Act, 2013, various Rules made thereunder for the time being in force and other legal requirements of the Central, State and other Government and Local authorities concerning the business and affairs of this company for the period commencing from to....., except the following:



Signed and issued, this day, the.....of20.....,
at

Sd/-

Managing Director

Sd/-

Compliance Officer

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