



Index

- 1. Data Protection/Privacy Policy
- 2. Anti-bribery/Anti-corruption policy
- 3. Conflict of Interest policy
- 4. Record Management policy
- 5. Incident Management policy
- 6. Modern Slavery Policy
- 7. Child Labour Policy



1. Data Protection/Privacy Policy

i. Introduction

At BigBox, we are committed to protecting the privacy of our clients' personal data. This policy outlines how we collect, use, and protect the information we collect from our clients and website users.

ii. Collection of Personal Data

We collect personal data from our clients when they sign up for our services or use our website. This information may include their name, address, email address, phone number, and payment information. We may also collect data about their use of our services and website, such as IP address, browser type, and referral URL.

iii. Use of Personal Data

We use personal data to provide our services to our clients, communicate with them about their account, and respond to their enquiries. We may also use personal data for marketing and promotional purposes, but we will always give clients the option to opt out of such communications.

iv. Sharing of Personal Data

We do not sell or rent our clients' personal data to third parties. However, we may share personal data with our service providers and contractors who assist us in providing our services. We may also disclose personal data if we are required to do so by law or in response to a court order or subpoena.

v. Security of Personal Data

We take reasonable and appropriate measures to protect our clients' personal data from unauthorized access, disclosure, or misuse. We use industry-standard security measures, including encryption and firewalls, to protect personal data both during transmission and once it is received. We also limit access to personal data to those employees and contractors who need to know the information in order to perform their job duties.



vi. Retention of Personal Data

We retain personal data for as long as necessary to provide our services to our clients and to comply with legal obligations. When personal data is no longer necessary for these purposes, we will securely dispose it off.

vii. Your Rights

Clients have the right to access, modify, and delete their personal data at any time. They also have the right to object to the processing of their personal data and to withdraw their consent to our use of their personal data for marketing and promotional purposes.

viii. Changes to this Policy

We may update this policy from time to time to reflect changes in our practices or applicable laws. We will notify our clients of any material changes to this policy and obtain their consent where required by law.

ix. Contact Us

If you have any questions or concerns about this policy or our practices, regarding personal data, please contact us at [insert contact information].

By using our services or website, you agree to the terms of this policy and our collection, use, and sharing of personal data as outlined herein.



2. Anti-Bribery/Anti-Corruption Policy

Introduction

BigBox Ventures is committed to conducting business ethically and in compliance with all applicable laws and regulations. This Policy outlines our position on bribery and corruption and provides guidance to our employees and contractors on how to identify and prevent these activities.

Prohibition of Bribery and Corruption

BigBox Ventures prohibits all forms of bribery and corruption, including but not limited to:

1. Offering, promising, or giving anything of value, directly or indirectly, to any person, including government officials, to obtain or retain business or to secure any other improper advantage. Requesting or accepting anything of value, directly or indirectly, from any person, including clients, suppliers, or other third parties, in exchange for an improper advantage. Facilitating, encouraging, or assisting anyone in the commission of bribery or corruption. Compliance with Laws and Regulations BigBox Ventures requires its employees and contractors to comply with all applicable laws and regulations related to anti-bribery and anti-corruption, including but not limited to the Prevention of Corruption Act. Employees and contractors must also comply with any additional laws and regulations in the states or territories of India in which they operate.

2. Due Diligence

BigBox Ventures conducts due diligence on its clients, suppliers, and other third parties to assess their risk of involvement in bribery or corruption. We may refuse to do business with any party that fails to meet our standards or is found to be involved in such activities.

3. Reporting and Investigating Suspected Bribery or Corruption

BigBox Ventures encourages its employees and contractors to report any suspected or actual instances of bribery or corruption. Reports can be made to the Compliance Officer, Human Resources, or Legal Department. BigBox Ventures will investigate all reports promptly and confidentially.



4. Disciplinary Action

Any employee or contractor found to have engaged in bribery or corruption, or to have facilitated, encouraged, or assisted in such activities, may be subject to disciplinary action, up to and including termination of employment or contract.

5. Training and Communication

BigBox Ventures provides training to its employees and contractors on the risks of bribery and corruption and their obligations under this policy. We also communicate regularly with our employees and contractors on the importance of ethical business practices and are commitment to compliance with all applicable laws and regulations.

6. Conclusion

BigBox Ventures is committed to conducting business ethically and in compliance with all applicable laws and regulations related to anti-bribery and anti-corruption. This Policy outlines our position on these activities and provides guidance to our employees and contractors on how to identify and prevent them.



3. Conflict of Interest Policy

i. Introduction

BigBox Ventures is committed to conducting business with the highest standards of ethical behavior and integrity. In order to ensure that all employees and contractors act in the best interests of the company, this policy outlines BigBox's position on conflicts of interest.

ii. Collection of Personal Data

A conflict of interest occurs when an employee or contractor's personal interests interfere or appear to interfere with their ability to act in the best interests of BigBox Ventures. Employees and contractors have a responsibility to avoid situations in which their personal interests might conflict with their duty to the company.

The following are examples of situations that may result in a conflict of interest:

- 1. Any financial interest, direct or indirect, by an employee or their family members in a competitor, supplier, or customer of BigBox Ventures.
- 2. The receipt of gifts, entertainment, or any other benefit from a supplier, customer, or competitor that could influence or be perceived to influence the employee's decision-making.
- 3. Any outside employment, consulting, or advisory relationships that may interfere with the employee's obligations to BigBox Ventures.
- 4. Serving on the board of directors, advisory board, or any other official capacity for a competitor, supplier, or customer of BigBox Ventures.

iii. Disclosure Requirements

All employees and contractors are required to disclose any situation that may result in a conflict of interest. This includes any financial interest, gifts, entertainment, outside employment, or other relationship that may create a conflict of interest. Employees and contractors are also required to update their disclosure on an ongoing basis as situations change.



The disclosure should be made in writing to the employee's supervisor, the Compliance Officer, or the Human Resources Department. If an employee or contractor is unsure whether a situation constitutes a conflict of interest, they should disclose the situation and seek guidance from the appropriate department.

iv. Resolution of Conflicts

Once a conflict of interest has been disclosed, the company will assess the situation and determine an appropriate course of action. In some cases, the employee or contractor may be required to divest themselves of any conflicting interests or relationships. In other cases, the employee or contractor may be reassigned to another position within the company. In extreme cases, termination of employment or contract may be necessary.

v. Consequences of Non-Disclosure

Failure to disclose a conflict of interest is a serious breach of trust and may result in disciplinary action, up to and including termination of employment or contract. Failure to disclose a conflict of interest may also result in legal action or damage to the company's reputation.

vi. Conclusion

BigBox Ventures is committed to conducting business with the highest standards of ethical behavior and integrity. This policy is intended to ensure that all employees and contractors act in the best interests of the company and avoid any situations that may result in a conflict of interest. Employees and contractors are expected to comply with this policy and to disclose any situations that may result in a conflict of interest in a timely and transparent manner.



4. Record Management Policy

i. Introduction

BigBox Ventures recognizes the importance of effective record management in ensuring compliance with legal and regulatory requirements, protecting sensitive information, and facilitating efficient business operations. This policy outlines BigBox's position on the creation, retention, storage, and disposal of company records.

ii. Policy Statement

All employees, contractors, and agents of BigBox Ventures are responsible for managing the records that they create, receive, or manage as part of their job responsibilities. Records include all types of media, including but not limited to paper documents, electronic files, emails, and voicemail messages.

iii. Creation of Records

All records created as part of job responsibilities must be accurate, complete, and timely. Employees and contractors must ensure that all information is recorded in accordance with established procedures, and that appropriate approvals are obtained when necessary.

iv. Retention of Records

Records must be retained for the length of time required by law or regulation, or in accordance with the company's retention schedule. Retention schedules will be established for each type of record, based on legal requirements, business needs, and other factors.

v. Storage of Records

Records must be stored in a secure location, whether in physical or electronic format, to prevent unauthorized access, theft, or loss. Access to records should be limited to those with a legitimate business need, and appropriate security measures should be put in place to protect confidential or sensitive information.

vi. Disposal of Records

Records must be disposed of in a manner that ensures the protection of confidential or sensitive information, and in accordance with the company's retention schedule. Disposal methods should be selected based on the sensitivity of the information and the format of the record, and may include shredding, erasing, or destroying physical or electronic media.



vii. Compliance

All employees, contractors, and agents of BigBox Ventures are responsible for complying with this policy and ensuring that records are managed in accordance with legal and regulatory requirements. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

viii. Conclusion

Effective record management is critical to the success of BigBox Ventures. This policy is intended to ensure that all employees, contractors, and agents of the company manage records effectively and in accordance with legal and regulatory requirements. It is the responsibility of all employees, contractors, and agents to comply with this policy and to report any concerns or violations to their supervisor or the Compliance Officer.



5. Incident Management Policy

i. Introduction

BigBox Ventures recognizes that incidents can occur in the workplace that can affect the safety and security of employees, clients, and visitors, as well as the company's assets and operations. An incident is any unplanned event that can disrupt normal business operations or cause harm to people, property, or the environment. This policy outlines the procedures to be followed in the event of an incident at BigBox Ventures.

ii. Policy Statement

All employees, contractors, and agents of BigBox Ventures must report any incidents or near-misses to their supervisor or the Incident Manager as soon as possible. Incidents will be investigated promptly and thoroughly, and appropriate actions will be taken to prevent recurrence and to mitigate the impact of the incident.

iii. Roles and Responsibilities

The Incident Manager will be responsible for managing the incident response process, including:

- **a.** Assessing the severity and scope of the incident
- **b.** Activating the incident response team and notifying appropriate stakeholders Coordinating the response activities and allocating resources
- c. Conducting an investigation to determine the root cause of the incident
- **d.** Developing and implementing corrective and preventive actions to prevent recurrence.
- **f.** All employees, contractors, and agents of BigBox Ventures have a responsibility to report incidents promptly and accurately, and to cooperate fully with the incident response team during the investigation and response process.

iv. Reporting an Incident

All incidents, regardless of severity, must be reported to the Incident Manager as soon as possible. Incidents can be reported verbally or in writing, and should include the following information:

a. Date, time, and location of the incident Description of the incident and its impact Names of individuals involved or affected Contact information for witnesses or others who can provide additional information.



- **b.** The Incident Manager will document the incident and initiate the appropriate response activities.
- **c.** The Incident Manager will assess the severity and Scope of the incident and determine the appropriate response activities.

Response activities may include:

- Notifying appropriate stakeholders, including employees, clients, and authorities Providing medical assistance to injured individuals.
- Evacuating the building or area if necessary Securing the area to prevent further damage or harm
- Conducting an investigation to determine the root cause of the incident Corrective and Preventive Actions
- **d.** Once the investigation is complete, the Incident Manager will develop and implement corrective and preventive actions to address the root cause of the incident and prevent recurrence.

Corrective actions may include:

 Repairing or replacing damaged equipment or infrastructure Conducting additional training or education for employees Implementing new policies or procedures to prevent recurrence

v. Compliance

All employees, contractors, and agents of BigBox Ventures are responsible for complying with this policy and reporting incidents promptly and accurately. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

vi. Conclusion

The Incident Management policy is critical to the safety and security of employees, clients, and visitors, as well as the protection of company assets and operations. All employees, contractors, and agents of BigBox Ventures must familiarize themselves with this policy and follow the procedures outlined in the event of an incident. It is the responsibility of all employees, contractors, and agents to report incidents promptly and accurately, and to cooperate fully with the incident response team during the investigation and response process.



6. Modern Slavery Policy:

i. Introduction

BigBox Ventures is committed to respecting human rights and upholding ethical principles in all aspects of its operations. We recognize that modern slavery, forced labour, and human trafficking are serious violations of human rights and have no place in our business or supply chain. This policy outlines our commitment to preventing and addressing modern slavery and sets out the steps we take to ensure compliance with applicable laws and regulations.

ii. Policy Statement

BigBox Ventures is committed to:

- **a.** Preventing modern slavery in all its forms and complying with all applicable laws and regulations related to modern slavery, forced labour, and human trafficking.
- **b.** Ensuring that our business and supply chain are free from modern slavery and forced Labour by conducting due diligence, risk assessments, and regular monitoring of our suppliers and contractors.
- **c.** Providing training and awareness programs to all employees, contractors, and suppliers to ensure that they understand the risks and impacts of modern slavery and forced Labour and know how to report any concerns or suspicions.
- **d.** Investigating any allegations of modern slavery or forced Labour in our business or supply chain, and taking appropriate action to address any identified risks or incidents.

iii. Scope

This policy applies to all employees, contractors, suppliers, and business partners of BigBox Ventures, including those located outside of India.

iv. Definitions

Modern slavery refers to all forms of slavery, forced labour, and human trafficking, including debt bondage, forced labour, slavery, and servitude, trafficking of persons, and the worst forms of child labour.

Supply chain refers to all individuals, organizations, and activities involved in the production, manufacturing, distribution, or delivery of goods and services.



v. Due Diligence

BigBox Ventures will conduct due diligence to identify and mitigate the risks of modern slavery and forced labour in our business and supply chain. Due diligence may include:

- Mapping our supply chain to identify potential risks of modern slavery and forced labour.
- Conducting risk assessments to identify high-risk suppliers, contractors, and business partners.
- Conducting audits and assessments of high-risk suppliers, contractors, and business partners to assess their compliance with modern slavery and forced labour laws and regulations.
- Including contractual provisions in our agreements with suppliers and contractors to ensure compliance with our Modern Slavery policy.
- Monitoring compliance with our Modern Slavery policy and taking appropriate action in the event of non-compliance.
- Reporting and Investigation
- **a.** All employees, contractors, and suppliers of BigBox Ventures must report any concerns or suspicions regarding modern slavery and forced labour to their supervisor, the Human Resources department, or the Ethics and Compliance team. All reports will be treated confidentially and investigated promptly and thoroughly.
- **b.** If any allegations of modern slavery or forced Labour are substantiated, BigBox Ventures will take appropriate action, which may include terminating relationships with suppliers, contractors, or business partners found to be in violation of our Modern Slavery policy.

vi. Training and Awareness

BigBox Ventures will provide training and awareness programs to all employees, contractors, and suppliers to ensure that they understand the risks and impacts of modern slavery and forced Labour and know how to report any concerns or suspicions. Training may include:

- Explanation of our Modern Slavery policy and related laws and regulations.
- Identification of modern slavery and forced Labour risks and indicators.
- Steps to report and investigate suspected incidents of modern slavery and forced Labour.



vii. Compliance

All employees, contractors, and suppliers of BigBox Ventures are responsible for complying with this policy and reporting any concerns or suspicions of modern slavery or forced labour. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

viii. Conclusion

BigBox Ventures is committed to preventing and addressing modern slavery and forced Labour in our business and supply chain. We recognize that modern slavery and forced Labour are serious violations of human rights and have no place in our operations. We will continue to assess and improve our policies and procedures to ensure compliance with applicable laws and regulations, and to uphold our commitment to human rights and ethical business practices.

We encourage our employees, contractors, and suppliers to join us in this commitment and to work together to prevent and address modern slavery and forced labour.



7. Child Labour Policy:

i. Introduction

BigBox Ventures is committed to respecting human rights and upholding ethical principles in all aspects of its operations. We recognize that child labour is a serious violation of human rights and has no place in our business or supply chain. This policy outlines our commitment to preventing and addressing child labour and sets out the steps we take to ensure compliance with applicable laws and regulations.

ii. Policy Statement

BigBox Ventures is committed to:

- **a.** Preventing child labour in all its forms and complying with all applicable laws and regulations related to child labour.
- **b.** Ensuring that our business and supply chain are free from child labour by conducting due diligence, risk assessments, and regular monitoring of our suppliers and contractors.
- **c.** Providing training and awareness programs to all employees, contractors, and suppliers to ensure that they understand the risks and impacts of child labour and know how to report any concerns or suspicions.
- **d.** Investigating any allegations of child labour in our business or supply chain, and taking appropriate action to address any identified risks or incidents.

iii. Scope

This Policy applies to all employees, contractors, suppliers, and business partners of BigBox Ventures, including those located outside of India.

iv. Definitions

Child labour refers to any work or activity that deprives children of their childhood, potential, and dignity, and that is harmful to their physical and mental development. It includes work that is mentally, physically, socially, or morally dangerous and harmful to children, and work that interferes with their education or prevents them from attending school.

Supply chain refers to all individuals, organizations, and activities involved in the production, manufacturing, distribution, or delivery of goods and services.



v. Due Diligence

BigBox Ventures will conduct due diligence to identify and mitigate the risks of child labour in our business and supply chain. Due diligence may include:

- Mapping our supply chain to identify potential risks of child labour.
- Conducting risk assessments to identify high-risk suppliers, contractors, and business partners.
- Conducting audits and assessments of high-risk suppliers, contractors, and business partners to assess their compliance with child labour laws and regulations.
- Including contractual provisions in our agreements with suppliers and contractors to ensure compliance with our Child Labour policy.
- Monitoring compliance with our Child Labour policy and taking appropriate action in the event of non-compliance.
- Reporting and Investigation
- **a.** All employees, contractors, and suppliers of BigBox Ventures must report any concerns or suspicions regarding child labour to their supervisor, the Human Resources department, or the Ethics and Compliance team. All reports will be treated confidentially and investigated promptly and thoroughly.
- **b.** If any allegations of child labour are substantiated, BigBox Ventures will take appropriate action, which may include terminating relationships with suppliers, contractors, or business partners found to be in violation of our Child Labour policy.

vi. Training and Awareness

BigBox Ventures will provide training and awareness programs to all employees, contractors, and suppliers to ensure that they understand the risks and impacts of child labour and know how to report any concerns or suspicions. Training may include:

- Explanation of our Child Labour policy and related laws and regulations.
- Identification of child labour risks and indicators.
- Steps to report and investigate suspected incidents of child labour.



vii. Compliance

All employees, contractors, and suppliers of BigBox Ventures are responsible for complying with this policy and reporting any concerns or suspicions of child labour. Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or contract.

viii. Conclusion

BigBox Ventures is committed to preventing and addressing child labour in our business and supply chain. We recognize that child labour is a serious violation of human rights and has no place in our operations. We will continue to assess and improve our policies and procedures to ensure compliance with applicable laws and regulations.

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