

# Acuity Knowledge Partners Global Procurement Policy: Version 5.1

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ORGANIZATION (OFFICE): ACUITY GLOBAL EXCLUDING SALES OFFICE

PROCESS: ACUITY GLOBAL PROCUREMENT POLICY- REVIEW

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| Prepared by: Syed Samir & Dhruv Kapur                                                                 | Date: May 25, 2016           |
| Reviewed & Approved by: Samar Mishra / Shailendra Gupta / Manjunatha Nayak / Gopal Garg / Dhruv Kapur | Date: Jul 10, 2016           |
| Originally Effective from                                                                             | Date: Aug 1, 2016            |
| Version (3.0) Reviewed & approved by Syed Samir & Dhruv Kapur respectively                            | Date: Nov 11, 2020           |
| Last Version (4.0) Reviewed & Approved by Syed Samir & Dhruv Kapur respectively                       | Date: Sep 20, 2022           |
| Current version (5.0) Reviewed & Approved by Syed Samir & Dhruv Kapur respectively                    | Date: Feb 20, 2024-Tentative |
| Reviewed Version (5.1) Effective from                                                                 | Date: Aug 1, 2025            |
| Prepared by - Syed Samir                                                                              |                              |
| Reviewed by- Dhruv Kapur & Vivek Gupta                                                                |                              |
| Approved by – Narasimhan S L                                                                          |                              |

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| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Controls                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Comments                                                                                                            |
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| <p><b>The procurement process is divided into the following types:</b></p> <ul style="list-style-type: none"> <li>• ADHOC P.O purchases</li> <li>• Contract Purchase (Goods &amp; Services)</li> <li>• Emergency Purchases</li> <li>• Recurring Purchases</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                     |
| <p><b>1. ADHOC PO Purchases</b></p> <p>The purchasing process begins with an email to Acuity procurement team from respective enablement services Business unit i.e. IT, Admin, HR, InfoSec / Compliance for purchase of Goods or services with details of item, description, quantity &amp; reason for purchase. IT PRs gets generated via ME Tool and shared with Procurement team. Upon Receipt of such PRs, Procurement team generates NetSuite PRs for further processing. All IT related purchases requires additional review and confirmation from Acuity IT.</p> <p>A. The employee/LOB/Function is responsible for obtaining approval/Budget Confirmation from Appropriate stake holder/ P&amp;L Lead/ Function Head/ Authorized Delegate and the same should be done prior to raising procurement requisition.</p> <p>B. All IT/ Admin related procurement requests need to be routed through authorized team members of Acuity IT / Admin team. Employees shall not directly mail their IT / Admin requirements to Acuity procurement team.</p> <p>C. All hardware and software purchases require additional review from Acuity IT Head or his directs or delegates. Any New Software purchase other than existing one needs to have InfoSec approval. Infosec approval also required for the vendor with whom Acuity required to share MNPI &amp; PII.</p> <p>D. Acuity Procurement team reviews the purchase requisition email for completeness If any information is missing, it contacts the requestor to obtain the missing information before creating NetSuite PR and. Then, NetSuite PR gets created once Procurement Team has complete details about product/Services, Once PR approved by respective Department Manager then procurement team proceed further to conclude procurement process.</p> <p>E. Temp/Soft vendor onboarding process; vendor gets the access of NetSuite Vendor Portal to complete on-boarding formalities, once vendor completes the formalities then AP team reviews vendor's details and ACTIVATE the vendor for transactions (Financial/none-financial).</p> <p>F. Acuity Procurement proceeds with finalization of the vendor after completing vendor activation process and runs appropriate DOA approval as per prevailing list of DOA which is reviewed/ updated from time to time. Updated DOA attached as per Annexure A (attached). This DOA approval activity is performed outside NetSuite (e.g., via email). All POs gets generated from NetSuite</p> | <ul style="list-style-type: none"> <li>• The employee is responsible for obtaining approval from their supervisor and the necessary management approvals. <b>CP-AP-002 (KC)</b></li> <li>• Acuity Procurement Team reviews the purchase requisition email/ PR for completeness and appropriate approvals from management and the user department. <b>CP-AP-003 (CC).</b></li> <li>• Approval as per DOA is required. Additional approval from IT is required for IT purchases, Additional approval from Compliance is required for Compliance purchases, Additional approval from HR is required for HR purchases. <b>CP-AP-007 (KC)</b></li> </ul> | <p>ADHOC Purchases less than INR 41.5K /\$500 (equivalent of local currency) does not mandate three quotations.</p> |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Controls                                                                                                                                                                                                                                                                                                                       | Comments |
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| <p>based on DOA approvals only. Procurement manager ensures that required DOA approval is in place and a copy of appropriate DOA approval email attached with NetSuite PO before approving any PO in NetSuite.</p> <p>G. Acuity Procurement proceeds with a minimum of three quotes for purchases above INR 41.5K / \$500 (equivalent to local currency) for finalization of the vendor and DOA approval. Updated DOA attached as per Annexure A.</p> <p>H. Acuity Procurement Team is required to include three quotations in the appropriate DOA request email except:</p> <ol style="list-style-type: none"> <li>If a particular BOM/work has been approved and executed in last 90 days.</li> <li>For any work/item whose price is &lt;= INR 41.5K/\$500</li> <li>For work/item required on urgent basis.</li> <li>Online purchases.</li> <li>Purchase is directly through OEM (Original Equipment Manufacturer/ Service Provider/ Software Producer and Sole Reseller for such products and Services).</li> <li>Market Data source purchases – It's been handled by Different Acuity Team separately.</li> <li>Professional, Insurance and Legal Services.</li> <li>Consultation Fees.</li> <li>Corporate Training.</li> <li>Travel Related expenses.</li> <li>Employee Engagement related activities.</li> <li>Restaurants / Hotels / Team Fund.</li> </ol> | <ul style="list-style-type: none"> <li>In order to ease out approval process and to reduce the number of approvals from DOA, DOA approval up to \$10K can be on amount threshold and Vendor can be approved by either DOA or Department Manager later for PO / payment purchases.<br/><b>CP-AP-New Control (KC)</b></li> </ul> |          |
| <b>1.1 Receiving Goods &amp; Services / Material Inward</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                |          |
| <ol style="list-style-type: none"> <li>A material inward register is maintained by the Acuity Admin department to record the materials received.</li> <li>Acuity Admin must sign the Inward register to accept the goods in all the cases. IT related purchases have an additional signature from IT team.</li> <li>The user department confirms receipt and acceptance of goods and / or services by email approval or through approving a voucher in the NetSuite workflow (Note: email sent by user department to AP is a default approval, that by sending invoice for processing by user department, it is duly approved by them). In NetSuite Department Manager approval is considered that Goods/ Services has been received and invoice is good to pay.</li> <li>For all other purchases except IT, Acuity procurement informs the requestor on the services rendered and thus this is not captured in the material inward register.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                |          |
| <b>1.2 Invoice Receipts</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                |          |
| <ol style="list-style-type: none"> <li>Post receiving of goods / services Acuity procurement / Respective BU will match the invoice with a PO/ DOA approval before forwarding the invoice to AP for payment. All ADHOC Purchases' (concluded by Procurement) invoicing for IT is being handled by Procurement team and rest are jointly by Admin/ Respective BUs.</li> <li>Once a correct invoice is received for an ADHOC PO, Acuity procurement /Administration team will match the invoice with PO/ DOA approval before forwarding the invoice to AP for payment. All contractual invoices get reviewed / okayed and processed by respective relevant BU.</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <ul style="list-style-type: none"> <li>Any material received is logged by Admin in a material inward register. <b>CP-AP-009 (CC)</b></li> </ul>                                                                                                                                                                                |          |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Controls | Comments                                                                                                                                                                                                                                                                                                                                                                                              |
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| <ul style="list-style-type: none"> <li>c) Acuity procurement team manually tracks open POs and the goods received but not invoices for its own convenience and clarity.</li> <li>d) Post receiving correct invoices Finance team proceeds with Accounts payable process for payments of vendors. Details are covered in accounts payable process.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |          |                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>2. Contracts Purchases (Goods &amp; Services)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"> <li>A. The purchasing process begins with an email to Acuity procurement team from respective enablement services Bus i.e. IT, Admin, HR, InfoSec / Compliance for purchase of Goods or services with details of item, description, quantity &amp; reason for purchase. IT PRs gets generated via ME Tool and shared with Procurement team. Upon Receipt of such PRs, Procurement team generates NetSuite PRs for further processing. All IT related purchases requires additional review and confirmation from Acuity IT.</li> <li>B. The employee/LOB/Function is responsible for obtaining approval/Budget Confirmation from Appropriate stake holder/ P&amp;L Lead/ Function Head/ Authorized Delegate and the same should be done prior to raising procurement requisition.</li> <li>C. All IT/ Admin related procurement requests need to be routed through authorized team members of Acuity IT / Admin team. Employees shall not directly mail their IT / Admin requirements to Acuity procurement team.</li> <li>D. All hardware and software purchases require additional review from Acuity IT Head or his directs or delegates. Any New Software purchase other than existing one needs to have InfoSec approval. Infosec approval also required for the vendor with whom Acuity required to share MNPI &amp; PII.</li> <li>E. Acuity Procurement team reviews the purchase requisition email for completeness If any information is missing, it contacts the requestor to obtain the missing information before creating NetSuite PR and. Then, NetSuite PR gets created once Procurement Team has complete details about product/Services, Once PR approved by respective Department Manager then procurement team proceed further to conclude procurement process.</li> <li>F. For vendor Engagements (contract purchases only) with an annual value greater than US \$250K, Acuity Procurement may initiate and manage a formal competitive bid process (e.g., An RFP with at least three bidders using NetSuite Portal only). However, in certain instances it may not be appropriate to conduct a RFP process and Acuity Procurement will recommend an alternative mechanism to obtain competitive commercial terms.</li> <li>G. Acuity Procurement proceeds with a minimum of three quotations / RFQs for purchases/ agreements / contracts where annual spend is above INR 41.5K / \$500 (equivalent to local currency) and all renewals of existing contracts where annual spend is more than INR 1,200K / \$ 14,500 (equivalent to local currency) for finalization of the vendor and DOA approvals as per Annexure A (Attached). Procurement manager ensures that required DOA approval is in place before approving any PO in NetSuite.</li> <li>H. Acuity Procurement proceeds with finalization of the vendor after complete vendor evaluation process and runs appropriate DOA approval as per prevailing DOA list which is reviewed/ updated from</li> </ul> |          | <p>Procurement team shall review the Vendor performance sheet shared by the requestor at the time of renewal of contracts. Performance review of all vendors providing services (transport &amp; non transport) to be carried out on a half yearly basis by respective departments to assess the performance of the vendor. Attached format as given in Annexure B to be used for the evaluation.</p> |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Controls | Comments |
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| <p>time to time. Updated DOA attached as per Annexure A (Attached). This DOA approval activity is performed outside NetSuite (via email)</p> <p>I. Post DOA, Acuity Procurement raises "Purchase Contract Required" option using NetSuite to Acuity Legal for review and execution of contracts. Once Contracts gets executed then Acuity Legal creates "Purchase Contract" in NetSuite, basis on what Acuity Procurement team creates POs in the NetSuite Tool. Purchase contract would be linked with Purchase order with PC number where executed contract will be uploaded by Legal team using that PC (Purchase Contract).</p> <p>J. All Transaction irrespective of spend needs to have a System generated PO for AP process and Audit trail. Acuity Legal team can direct Acuity Procurement to issue PO in lieu of formal contracting in case it deems appropriate; Acuity Procurement to follow the suite as directed. As of now this process is applicable to purchases made via procurement team. Some of the purchases which are not routed through procurement team (e.g. Professional services contract of finance team), this process is not applicable.</p> |          |          |
| <b>2.1 Receiving Goods &amp; Services</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |          |          |
| <p>a) Acuity procurement informs the requestor on the services rendered under this category and thus this is not captured in the material inward register. Respective BUs to whom contract belongs, shall be responsible for handling all activities with the vendor post contract finalization.</p> <p>b) Signature from Admin on invoices/ sending email to AP team requesting for invoice processing/ approval of invoice within NetSuite as Department Manager is treated sufficient to confirm the receipt.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |          |          |
| <b>2.2 Invoice Receipts</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |          |          |
| <p>a) Post receiving of goods / services respective Acuity BUs (IT, Admin, HR, Finance, InfoSec, Compliance etc.) initiates the payment process.</p> <p>b) Once a correct invoice is received, respective Acuity BUs (IT, Admin, HR, Finance, InfoSec, Compliance etc.) will match the invoice with a PO/ DOA approval before forwarding the invoice to AP for payment.</p> <p>c) Acuity procurement team manually tracks the open POs and the goods received but not invoiced for its own convenience and clarity. We are evaluating if this process can be brought within NetSuite.</p> <p>d) Post receiving correct invoices Finance team proceeds with Accounts payable process for payments of vendors.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                            |          |          |
| <b>2.3 Vendor Contract MasterFile Maintaining / Updating</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |          |          |
| <p>i. Master List of all SW deployed in the Acuity environment – Maintained by Acuity IT along with license count and renewal dates.</p> <p>ii. Addition / deletion of SW from this list to be approved by Acuity Information Security.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |          |          |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                         | Controls | Comments |
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| <ul style="list-style-type: none"> <li>iii. Notification of license expiration / upcoming renewals to be sent by Acuity IT to Acuity Procurement and Business 90 days in advance.</li> <li>iv. Business to confirm continued usage to Acuity procurement 60-90 Days in advance.</li> <li>v. Acuity procurement to take ownership of renewal process and renew prior to expiry date.</li> <li>vi. Acuity IT to update roster as per new renewals.</li> </ul> |          |          |

### 3. Emergency Purchases

- A. The purchasing process begins with an email to Acuity procurement team for purchase of Goods or services.
- B. The employee/LOB/Function is responsible for obtaining approval/Budget Confirmation from Appropriate stake holder/ P&L Lead/ Function Head/ Authorized Delegate and the same should be done prior to raising procurement requisition.
- C. Acuity Procurement proceeds with finalization of the vendor and DOA approval. Updated DOA attached as per Annexure A (Attached).
- D. Acuity procurement team generates P.O / places order using NetSuite Portal.
- E. If time permits Vendor on-boarding and other formalities shall be completed before receiving goods / services else, it shall run simultaneously or may be completed post receiving services.

#### 3.1 Receiving Goods & Services / Material Inward

- a) A material inward register is maintained by Acuity Admin department to record the materials received.
- b) Acuity Admin must sign the Inward register to accept the goods in all the cases. IT related purchases have an additional signature from IT. Signature from Admin on invoices/ sending email to AP team requesting for invoice processing/ approval of invoice within NetSuite as Department Manager is treated sufficient to confirm the receipt.
- c) For rest of all except IT, Acuity procurement informs the requestor on the services rendered and thus this is not captured in the material inward register.

#### 3.2 Invoice Receipts

- a) Post receiving of goods / services Acuity procurement / Respective BUs initiates the payment process.
  - b) Once a correct invoice is received, Acuity procurement /Administration team will match the invoice with a PO/ DOA approval before forwarding the invoice to AP for payment using NetSuite Portal.
  - c) Acuity procurement team manually tracks the open POs and the goods received but not invoiced for its own convenience and clarity. We are evaluating if this process can be brought within NetSuite Tool.
  - d) For Corporate Mobility payment made based on user invoice being forwarded to Finance by Acuity Admin team for payment using NetSuite Portal.
  - e) Post receiving correct invoices Finance team proceeds with Accounts payable process for payments of vendors using NetSuite Portal.
- The –Location Head-Admin will match the invoice to the purchase approval, once matched the invoice is cleared for entry into the system and is sent to the Finance department.  
**CP-AP-010 (KC)**

### 4. PO Processing process

- A. Post DOA approval Acuity procurement is required to generate PO (using approved PR from or

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                              | Controls                                                                                                                                                                                                               | Comments                                                                                                                                                                                             |
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| standalone) NetSuite Portal for all type of purchases. However, in case of certain Contract purchase type of transaction, Acuity Legal may direct to issue only PO, where the amount is not more than INR 1,200K / \$14,500 annually (Equivalent in local currency).                                                                                                                                                             |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| B. All PO's amounting more than INR 500K / \$6000 (Equivalent in local currency) and generated for Acuity India entities, shall require a review and confirmation from finance team in addition to the approval from procurement manager. All other Acuity entities' (overseas entities) POs are required to be signed by relevant authorized signatory (s) for that particular entity as mandated by Acuity's Board Resolution. |                                                                                                                                                                                                                        | PO's are not applicable for the following cases:                                                                                                                                                     |
| C. The Acuity Procurement team shall use the P.O format duly approved by Acuity Legal Team from time to time and as uploaded in NetSuite Portal.                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                        | 1. Professional, and Legal Services.                                                                                                                                                                 |
| D. Acuity Procurement team is responsible for entering the PO end date, payment terms and ship to/bill to addresses info while generating POs using NetSuite Portal.                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                        | 2. Online purchases.                                                                                                                                                                                 |
| E. To place the order, Acuity Procurement team will fax/email/mail the PO to the vendor. Vendor can see relevant PO using Acuity's NetSuite Portal by its own, provided it has accepted and agreed for using Vendor access.                                                                                                                                                                                                      |                                                                                                                                                                                                                        | 3. Travel and daily expenses related charges.                                                                                                                                                        |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 4. Corporate card expense                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 5. Cab charges                                                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 6. Electricity Charges                                                                                                                                                                               |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 7. Registration & Licensing fees                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 8. Charges related to finance.                                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 9. Registration & Licensing fees                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 10. MDS invoices (subscription)                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 11. Intern Invoices                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 12. Meal coupon                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 13. CAWI vendor invoices (online survey sample procurement invoices)                                                                                                                                 |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 14. Foreign vendor Payment                                                                                                                                                                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 15. Rent Invoices (for international entities)                                                                                                                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 16. Consulting service (for international entities)                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 17. Payroll service                                                                                                                                                                                  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 18. Corporate card Mobility related payments                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | Additional check points for PO's as follows:                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 1. Vendor should have been onboarded on NetSuite Portal. AP team is responsible for onboarding the vendor on the request of Acuity Procurement                                                       |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 2. Correct Invoicing Entity to be mentioned.                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 3. Approval based on DOA.                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 4. Unit level invoicing; Where POs are raised for Bangalore, the same should be raised separately for SEZ UNIT I, SEZ UNIT II and STPI depending upon the unit for which such PO is raised and there |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 5. Replication of all terms of Quotation; The PO should have an exact replication of the terms mentioned in the Quotation wrt payment terms, Quantity, description of items, taxes etc.              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 6. Update to Finance; list of all POs should be shared with Finance with a brief summary of the PO on a timely basis for accounting, timely payment of advances / invoices                           |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                        | 7. Tagging of client related procurements; where any PO is raised by Acuity as per client requirement and the client has agreed for the reimbursement of the same,                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  | • NetSuite assigns each purchase order a unique purchase order (PO) number (only in cases where goods/materials are ordered, not applicable for services) which is used to track and reference each PO. CP-AP-005 (KC) |                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  | • Procurement Team reviews the open PO listing maintained by the Procurement team on monthly basis. CP-AP-006 (KC)                                                                                                     |                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                                                                                                                                                                                                  | • The Location head – Administration / – IT receives recurring invoices and sends them to the appropriate management for review and approval. CP-AP-008 (KC)                                                           |                                                                                                                                                                                                      |
| <b>5. Recurring Purchases</b>                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| A. Non-PO purchases such as the periodic invoices for mobile, electricity bill, Telephone usage, , Company Corporate Credit Cards, Travel, Transport etc. bypass the purchase order process.                                                                                                                                                                                                                                     |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| <b>6. Purchases using P Card</b>                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| P Card purchase guidelines should be referred for such purchases.                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| <b>7. Supplier Diversity Program as per Annexure C (Attached).):</b>                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| <b>8.Acuity Sustainable Procurement Policy</b>                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
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| <b>Introduction</b>                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |
| At Acuity Knowledge Partners, we recognize that responsible procurement is an important part of how we operate as a business. As a global provider of research, analytics, and                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                        |                                                                                                                                                                                                      |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    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| <p>consulting services, we rely on a wide range of suppliers and service providers. The decisions we make in sourcing goods and services can influence not only our operations, but also our environmental, social, and ethical impact.</p> <p>This Sustainable Procurement Policy outlines Acuity's approach to building a supply chain that supports good governance, fair labor practices, environmental responsibility, and business integrity. It reflects our ongoing work to embed sustainability across our operations, including the training and engagement of our procurement teams.</p> <p>The policy draws from recognized international frameworks, including:</p> <ul style="list-style-type: none"> <li>• The EcoVadis Sustainable Procurement Principles</li> <li>• The UN Global Compact</li> <li>• ILO Core Conventions</li> <li>• OECD Guidelines for Multinational Enterprises</li> <li>• ISO 14001, ISO 20400, and SA8000 standards</li> </ul> <p>This policy supports our goal to work with suppliers who act responsibly, comply with applicable laws, and share our commitment to improving sustainability performance over time. It also aligns with our Supplier Code of Conduct and supplier training program.</p> <p><b>Scope and Applicability</b></p> <p>This policy applies to all individuals and organizations that provide goods, services, or business support to Acuity Knowledge Partners, including suppliers, contractors, subcontractors, consultants, and their representatives.</p> <p>It is applicable across all procurement categories, including but not limited to:</p> <ul style="list-style-type: none"> <li>• <b>People suppliers</b> – providers of staffing, consulting, or contractual personnel</li> <li>• <b>Service providers</b> – vendors delivering logistics, travel, catering, security, or facilities support</li> <li>• <b>Product suppliers</b> – suppliers of IT hardware, software, infrastructure, and office supplies</li> </ul> <p>Acuity recognizes that suppliers operate in diverse regions and industries and may be at different stages in their sustainability journey. We encourage all partners to progressively align with this policy and to promote similar practices within their own supply chains.</p> <p>While adherence to this policy is not a contractual obligation, we view it as a shared framework to support responsible and transparent supplier engagement. It should be read in conjunction with Acuity's Code of Conduct and any additional requirements included in supplier onboarding, assessments, or contract terms.</p> <p><b>Objectives</b></p> <p>The purpose of this policy is to guide procurement practices that support Acuity's broader sustainability goals and contribute to responsible, long-term supplier partnerships. The key objectives are to:</p> | <ul style="list-style-type: none"> <li>• Acuity ESG team is to be responsible for-<br/><b>Environmental Controls:</b> continuous Monitoring along with verifying suppliers' compliance with waste management, water conservation &amp; pollution norms along with all ESG reports, certifications etc. as per Guidelines / local laws.<br/><b>Social Controls:</b> Checking adherence to labor standards (wages, working hours, no child/forced labor), monitor supplier diversity (e.g., women-owned, minority owned businesses) &amp; track health &amp; safety compliance and incident reporting.<br/><b>Governance Controls:</b> Mandate supplier code of conduct signed and acknowledged, review anti-bribery, anti-corruption, and ethical sourcing policies, regular ESG audits and third-party assessments of high risk vendors, and track transparency of supply chain through reporting and disclosures..<br/><b>New Control</b></li> </ul> | <p>Finance needs to be informed specifically.</p> <ol style="list-style-type: none"> <li>DOA approvals should be on consolidated values (based on original negotiations)</li> <li>Documentation; All necessary documents relating to a PO should be maintained by procurement. These should include the following, though the list is not exhaustive <ol style="list-style-type: none"> <li>PO (NetSuite Repository being used).</li> <li>All quotes taken by Acuity Procurement.</li> <li>DOA Approval Emails.</li> <li>Client approvals (for reimbursable Procurements)</li> <li>Request mails from concerned department needing the service / goods.</li> <li>Checklist document duly signed, if any.</li> <li>Vendor onboarding forms (AP team / NetSuite Repository).</li> <li>Approval mail should cover the aspect as to why L1 is not chosen.</li> <li>Foreign payments relating documents (like 10f, TRC, Pan card etc.).</li> </ol> </li> <li>Tax deduction arrangement with foreign vendors; TDS is applicable on certain services / software procurements from international vendors</li> </ol> <p>Clarifications for this section:</p> <ol style="list-style-type: none"> <li>For recurring expenses like, Energy charges, Telephony etc. as LOI (Letter of Intent), Agreements, Contracts are in place for the same.</li> <li>For travel related expenses (air/ train tickets, hotel expenses etc.). Admin includes number of quotations, based on requisition requirement, and take approval from Director – Operations /SMD/ appropriate DOA on the best quotation to book the ticket/ hotel/Visa/travel insurance/Matrix/ Calling card/Currency procurement.</li> <li>All the recurring expenses related to Admin should be approved by respective Admin Lead /head of each location</li> <li>All the recurring expenses related to IT department should be approved by respective IT Lead /Heads at each location</li> <li>Nonrecurring expenses are the onetime expenses for purchase of goods or services.</li> <li>For travel related expenses -&gt;Air fare/Accommodation/Visa/Insurance/ PCC/ Apostille charges generally fixed but may vary marginally</li> </ol> |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Controls | Comments                                                                                                                                                                                                                                                                                     |
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| <ul style="list-style-type: none"> <li>• <b>Promote ethical business conduct</b> across the supply chain through fair, transparent, and compliant sourcing practices</li> <li>• <b>Encourage suppliers to improve their environmental, social, and governance (ESG) performance</b> in alignment with recognized global standards</li> <li>• <b>Integrate sustainability criteria into supplier evaluation, selection, and engagement</b> processes</li> <li>• <b>Reduce procurement-related risks</b> by supporting supply chain resilience, regulatory compliance, and responsible behavior</li> <li>• <b>Strengthen awareness among internal teams and external partners</b> of the impact of procurement decisions</li> <li>• <b>Support continuous improvement</b> through training, dialogue, and performance monitoring related to sustainable sourcing</li> </ul> <p>These objectives reflect Acuity's intention to align procurement with business integrity, climate responsibility, and human rights, while building value for our clients and partners.</p> <p><b>Key Focus Areas</b></p> <p>Our approach to sustainable procurement is centered around four core areas that reflect international best practices and the expectations we hold for our supply partners:</p> <p><b>- Ethical Business Practices</b></p> <p>We value transparency, fairness, and accountability in all supplier relationships. We encourage suppliers to:</p> <ul style="list-style-type: none"> <li>• Conduct business in compliance with all applicable laws and regulations</li> <li>• Promote fair competition and avoid practices such as bribery, fraud, and conflicts of interest</li> <li>• Respect Acuity's confidential information, intellectual property, and data protection expectations</li> <li>• Maintain integrity in communications, documentation, and brand representation</li> </ul> <p><b>- Labor and Human Rights</b></p> <p>We support international human rights principles and promote safe, inclusive, and fair workplaces. We expect suppliers to:</p> <ul style="list-style-type: none"> <li>• Avoid the use of child labor, forced labor, or any form of human trafficking</li> <li>• Provide fair wages, benefits, and working hours in line with applicable labor laws</li> <li>• Prohibit discrimination and harassment in the workplace</li> <li>• Respect workers' rights to freely associate and engage in collective bargaining</li> <li>• Implement ethical recruitment practices</li> </ul> <p><b>- Health, Safety, and Well-being</b></p> <p>A healthy and safe work environment is essential to sustainable operations. Suppliers are encouraged to:</p> <ul style="list-style-type: none"> <li>• Comply with local occupational health and safety laws</li> </ul> |          | <p>depending upon the availability or at the time of booking work done on exceptional cases. So there is an additional amount (as per signed contract) will be considered on and above the invoice amount.</p> <p>7. GST/any other tax is not a part/not included in the approval value.</p> |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Controls | Comments |
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| <ul style="list-style-type: none"> <li>Identify and manage workplace hazards</li> <li>Promote physical and psychological well-being</li> <li>Ensure emergency preparedness and access to safety equipment where applicable</li> </ul> <p><b>- Environmental Responsibility</b></p> <p>We aim to work with suppliers who are actively managing their environmental impact. We encourage:</p> <ul style="list-style-type: none"> <li>Compliance with environmental laws and regulations</li> <li>Efforts to reduce greenhouse gas emissions, waste, and resource consumption</li> <li>Use of sustainable materials and energy-efficient operations</li> <li>Implementation of environmental management systems such as ISO 14001</li> <li>Promotion of digital-first and low-carbon practices wherever feasible</li> </ul> <p><b>Policy Endorsement</b></p> <p>This Sustainable Procurement Policy reflects Acuity Knowledge Partners' commitment to embedding ESG principles into our sourcing practices and supplier relationships. It serves as a guide for our teams and partners to promote ethical conduct, social responsibility, and environmental stewardship in a practical and collaborative manner.</p> <p>We view this policy as a living framework, one that will continue to evolve alongside global standards, client expectations, and our own sustainability journey. We encourage all suppliers to engage with us in advancing these shared goals and building a responsible, future-ready supply ecosystem.</p> <p><b>Implementation and Continuous Improvement</b></p> <p>Acuity views sustainable procurement as an evolving journey that involves active participation from both internal teams and external partners. While this policy outlines our expectations, we also recognize that implementation will be shaped by context, capacity, and a shared willingness to improve.</p> <p><b>- Internal Alignment</b></p> <ul style="list-style-type: none"> <li>Procurement and business teams are encouraged to integrate sustainability considerations into sourcing decisions, supplier evaluations, and contract discussions.</li> <li>Training and awareness-building initiatives are promoted internally to strengthen ESG understanding and application in procurement processes.</li> </ul> <p><b>- Supplier Engagement</b></p> <ul style="list-style-type: none"> <li>Acuity shares this policy and its Supplier Code of Conduct with all relevant vendors as part of onboarding and renewal cycles.</li> <li>Suppliers are invited to communicate their sustainability practices and progress, including relevant certifications, disclosures, or improvement efforts.</li> <li>Collaboration with suppliers is encouraged to support ESG enhancements in areas such as</li> </ul> |          |          |

| Detailed Procedures                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Controls | Comments |
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| <p>responsible sourcing, diversity, emissions reduction, and innovation.</p> <p><b>- Assessments and Dialogue</b></p> <ul style="list-style-type: none"> <li>• ESG criteria may be included in supplier performance reviews or risk assessments.</li> <li>• Tools such as sustainability self-assessments or third-party ratings (e.g., EcoVadis) may be used to guide ongoing engagement.</li> <li>• Suppliers are welcome to raise questions, share feedback, or request clarification related to this policy.</li> </ul> <p><b>- Commitment to Progress</b></p> <ul style="list-style-type: none"> <li>• We recognize that not all suppliers will meet every aspect of this policy immediately.</li> </ul> <p>Our aim is to foster transparent, long-term relationships where mutual learning and capacity-building enable measurable sustainability improvements over time.</p> |          |          |



DOA Matrix v 1.7 Jan  
25.pdf

**Annexure A :**



Supplier  
Re-Evaluation Form.xl

**Annexure B :**



Acuity Supplier  
Diversity Policy.pdf

**Annexure C:**

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## About Acuity Knowledge Partners

Acuity Knowledge Partners, formerly part of Acuity Corporation, is a leading provider of bespoke research, analytics, staffing and technology solutions to the financial services sector.

Headquartered in London, Acuity Knowledge Partners has nearly two decades of transformation experience in servicing over 300 clients with a specialist workforce of over 2,500 analysts and delivery experts across its global delivery network.

We provide our clients with unique assistance not only to innovate, implement transformation programmes and increase operational efficiency, but also to manage costs and improve their top lines.

### **Our expertise includes the following:**

- Investment Banking: origination and trading support
- Investment Research support: covering all asset classes in terms of ideation, data science, and research support across the buy side and sell side
- Commercial Lending support: across origination, credit assessment, underwriting, and covenant and portfolio risk for all lending types
- Private Equity: origination, valuation and portfolio monitoring support
- Asset Management services support: across marketing, investment research, portfolio management/optimisation, risk and compliance
- Corporate and Consulting services: market and strategic research; survey work; treasury and counterparty risk support; and CEO office support, including M&A, FP&A and investor relations support
- Compliance support: AML analytics, KYC, counterparty credit risk modelling and servicing across banks, asset managers and corporates
- Data Science: web scraping, data structuring, analytics and visualisation These services are supported by our proprietary suite of Business Excellence and Automation Tools (BEAT) that offer domain-specific contextual technology.

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Acuity Knowledge Partners is assisted by Equistone Partners Europe, a leading private equity organisation that backs specialist growth businesses and management teams.

[Acuitykp.com](https://Acuitykp.com) | [contact@Acuitykp.com](mailto:contact@Acuitykp.com)