



## **ANTI-BRIBERY & ANTI-CORRUPTION (ABAC) POLICY**

### ***Policy Statement***

The Anti Bribery and Anti Corruption Policy (the 'Policy') of Ras Tek Pvt. Ltd., has been developed in accordance with Code of Conduct, policies, rules and regulations adopted by the company.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. We remain bound by local and national laws.

The Policy is available on the corporate website. Ras Tek Pvt. Ltd., openly expresses its opposition to corruption; welcomes and encourages compliance with the principles and requirements of the Policy by all contractors, employees, associated parties/companies, its managerial bodies and other persons.

### ***Definitions***

**“Agent”**: any individual acting as an agent, paid by the company, acting on the company's behalf in negotiating with third parties.

**“Bribery” / “Corruption”**: bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, to induce or reward improper conduct or to gain any commercial, contractual, regulatory or personal advantage. It can be direct or indirect through third parties.

**“Company”**: all subsidiaries and affiliated companies.

**“Conflict Of Interest”**: occurs when an individual or organization is involved in multiple interests, one of which could possibly corrupt, or be perceived to corrupt, the motivation for an act in another.

**“Donation”**: a donation is a voluntary contribution in the form of monetary or non-monetary gifts to a fund or cause for which no return service or payment is expected or made. Contributions to industry associations or fees for memberships in organizations that serve business interests are not necessarily considered donations.



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**“Employee”:** for the purposes of this policy this includes all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or joint ventures or their employees, wherever they are located.

**“Facilitation Payments”:** a form of bribery in which small payments are made with the purpose of expediting or facilitating the performance by a public official of a routine governmental action and not to obtain or retain business or any other undue advantage. Facilitation payments are typically demanded by low level and low income public officials in exchange for providing services to which one is legally entitled without such payments.

**“Gifts, Invitations & Hospitality”:** invitations given or received to social functions, sporting events, meals and entertainment, gifts or customary tokens of appreciation.

**“Intermediary”:** includes but is not limited to agents, distributors, consultants, sales representatives, implementation partners, sales partners.

**“Kickback”:** a bribe to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage.

**“Public Official”:** officials or employees of any government or other public body, agency or legal entity, at any level, including officers or employees of state-owned enterprises and officers or employees of enterprises which are mandated by a public body or a state-owned enterprise to administrate public functions.

**“Sponsorship”:** sponsorship is about partnering with external organisations to deliver mutual benefits through an exchange of monies, products, services, content or other intellectual property.

**“Third Party”:** any individual or organization you come into contact with during the course of your work for us. This includes actual and potential customers, suppliers, business contacts, intermediaries, government and public bodies, including their advisors, representatives and officials, politicians and political parties.



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### ***Purpose and Objective***

- To initiate the steps to reduce the bribery and corruption risks to the business of the Company by setting out clear guidelines.
- To encourage employees and Directors to be vigilant and to act diligently in good faith.
- Monitoring and investigating instances of alleged corruption.
- Taking firm and vigorous action against any individual(s) involved in corruption.
- To minimize the risk of involvement of all employees and Directors in corruption related activities;
- To set responsibility for the employees of the company to know and comply with the principles and requirements of the Policy, the key rules of the applicable anti-corruption laws, as well as adequate procedures to prevent corruption.

### ***Scope***

This policy applies to all employees and relevant third parties of the company and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

This policy applies in all countries or territories where the company operates. Where local customs, standards, laws or other local policies apply that are stricter than the provision of this policy, the stricter rules must be complied with. However, if this policy stipulates stricter rules than local customs, standards, laws or other local policies, the stricter provisions of this policy shall apply.

### ***Gifts, Invitations & Hospitality***

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

You are prohibited from accepting a gift or giving a gift to a third party in the following situations:

- (a) It is made with the intention of influencing a third party to obtain or retain business, to gain a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- (b) It is given in your name and not in the name of the company;



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- (c) It includes cash or a cash equivalent (such as gift certificates or vouchers);
- (d) It is of an inappropriate type and value and given at an inappropriate time (e.g. During a tender process); and
- (e) It is given secretly and not openly.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable, justifiable and is proportionate. The intention behind the gift should always be considered.

### ***Facilitation Payments Or Kickbacks***

All Facilitation Payments and kickbacks are corrupt payments, and any such payment in the course of our Company's business is strictly forbidden. Facilitation Payments are often involved in obtaining non-discretionary permits, licenses or other official documents, expediting lawful customs clearances, obtaining the issuance of entry or exit visas, providing police protection, whether or not such actions are connected to the award of new business or the continuation of existing business.

### ***Use Of Third Party Agents, Consultants And Other Intermediaries***

Our Company may be held responsible for bribes paid on its behalf by third parties, with severe and often irreparable consequences, even if our Company did not authorize these payments. Therefore, it is critical that we are careful in the selection of agents, that is, those people or companies who act on our behalf.

All dealings with suppliers, agents, contractors, service providers, intermediaries, consultants, and advisors, shall be carried out with the highest standards of integrity and in compliance with all relevant laws and regulations. We expect all our third parties to share our values and our ethical standards.



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### ***Your Responsibilities***

It is not acceptable for you (or someone on your behalf) to:

- (a) Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- (b) Give, promise to give, or offer, a payment, gift or hospitality to a public official or third party to 'facilitate' or expedite a routine procedure;
- (c) Accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- (d) Accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- (e) Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy; or
- (f) Engage in any activity that might lead to a breach of this policy or perceived breach of this policy.

It is your responsibility to ensure that all accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept 'off-book'.

You must declare and keep a written record of all gifts, invitations & hospitality according to company practice accepted or offered, which will be subject to managerial review.

You must ensure all expense claims relating to gifts, invitations & hospitality or expenses incurred to third parties are submitted in accordance with the company's expenses policy and specifically record the reason for the expenditure.

The prevention, detection and reporting of any form of bribery & corruption are the responsibility of all employees. You must notify as soon as possible if you are offered a bribe, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.



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All employees have the responsibility to read, understand and comply with this policy. You should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. This policy should be read in conjunction with the company's gifts, invitations & hospitality policy, conflicts of interest policy and code of ethics.

Employees are encouraged to raise concerns about any instance, or suspicion, of malpractice at the earliest possible stage through their line manager or other available reporting

### ***Protection***

Employees who refuse to take part in bribery or corruption, or report in good faith under this policy their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future will be protected from detrimental treatment/retaliation. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

### ***Governance***

The Directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

HR personnel have primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it. This training shall also be given to intermediaries.

### ***Reporting and Actions***

Any violation/non-adherence of the Policy would be reported to the respective Disciplinary Committee and the respective Committee will take appropriate action(s) in consultation with the Legal Department.

In case any employee or any other person to whom this policy applies, is found to be indulged in corruption related activities, violation of any provisions of the Policy or any frivolous complaint, he /she may be subject to disciplinary action(s) including termination of services and such other administrative, civil or criminal action(s) as per the applicable statutes as mentioned in the Policy.



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### ***Appendix***

#### **"Red Flags"**

The following is a list of possible red flags that may arise during the course of your work for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly.

- (a) You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- (b) If the third party refuses to divulge adequate information during due diligence procedure;
- (c) You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a 'special relationship' with foreign public officials;
- (d) A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- (e) A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- (f) A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- (g) A third party requests an unexpected additional fee or commission to 'facilitate' a service;
- (h) A third party demands lavish gifts, invitations or hospitality before commencing or continuing contractual negotiations or provision of services;
- (i) A third party requests that a payment is made to 'overlook' potential legal violations;



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- (j) A third party requests that you provide employment or some other advantage to a friend or relative;
- (k) A third party requests that you make a political contribution or donation to the party or charity of their choice before agreeing to undertake a business relationship with the company
- (l) You receive an invoice from a third party that appears to be non-standard or customized;
- (m) A third party refuses to put terms agreed in writing;
- (n) You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- (o) A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us; or
- (p) You are offered an unusually generous gift or offered lavish hospitality by a third party.

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