ANTI -BRIBERY ANTI CORRUPTION POLICY

CHARGEZONE®	HR POLICIES	Section no.HR-POL-001
		Page no:21
	ABAC Policy	Origin date: 05/07/2022
		Revision no: 03
		Revision Date 16/07/2026

KKhargonkar

TECSO CHARGE ZONE LTD. VADODARA

Document Control

Document Title	Anti Bribery Anti-Corruption Policy
Document Number	HR-POL-001
Revision Number	03
Effective Date	05/07/2022
Next Review Date	December 2026
Process Owner	Human Resources Department
Prepared By	Ridhima Choudhary
Reviewed By	Kinnari Hariyani
Approved By	Kinnari Hariyani
Classification	Internal

Revision History

Rev No.	Date	Description of Change	Prepared By	Approved By
03	16/07/2026	Letterhead and format changes.	HR	Kinnari Hariyani

TECSO CHARGE ZONE LTD. VADODARA

ANTI -BRIBERY ANTI CORRUPTION POLICY

1. Purpose

TecSo ChargeZone Limited **("Company")** is committed to acting professionally, fairly and with integrity in all its business dealings and relationships, wherever it operates, and to implementing and enforcing adequate procedures to counter bribery and corruption.

The purpose of this policy **("ABAC Policy" or "Policy")** is to outline guiding principles for our employees, officers and vendors including but not limited to service vendors, material suppliers, manpower suppliers, etc. by building adequate procedures to prevent any activity or conduct which may be perceived as an instance of bribery, facilitation payments, or corruption.

The Policy aims to ensure that the Company's business is conducted in a socially responsible manner and in compliance with all applicable anti-bribery and corruption regulations.

2. Scope and Applicability

This ABAC Policy is applicable to our Company and all activities undertaken for or by the Company directly or indirectly.

This ABAC Policy is applicable to all individuals working at all levels and grades, including but not limited to directors, senior managers, officers and other employees (whether they be permanent, fixed-term or temporary), trainees, seconded staff, volunteers, interns and agency staff or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as **"employees"** in this policy).

This ABAC Policy also applies to all individuals or organisations who come into contact during the course of work, and includes actual and potential: clients, customers, contractors, consultants, suppliers, distributors, business contacts, agents, advisors, and government and public bodies, including their advisors, representatives and officials; politicians and political parties (all of the aforesaid being collectively referred to as **"Third Party"**).

3. Policy statement

It is our policy to conduct our business with integrity and commitment in an honest and ethical manner. We take a zero - tolerance approach to bribery and corruption. We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws in India in respect of our conduct both at home and abroad.

K Khazizyani

Bribery and corruption are punishable for individuals by up to ten years' imprisonment and a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

This Policy covers:

- Bribery.
- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.
- Interactions with customers.
- Dealing with Third Parties.
- Sponsorships; and
- Inspections, Fines & Penalties

4. Definitions

Bribery

Bribery is the offering, promising, giving, accepting, authorizing or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribery includes advantages provided directly, as well as indirectly through an intermediary.

Gift, Hospitality and Entertainment

- A gift is anything of value and would encompass any gratuitous monetary or non-monetary benefit. It includes tangible items such as cash, precious metals and stones, jewellery, art, and any of their equivalents, and intangible items such as discounts, services, loans, favours, special privileges, advantages, benefits and rights that are not available to the general public.
- Hospitality generally includes refreshments, meals, travel and accommodation.
- Entertainment generally includes vacation, trips, use of recreational facilities, ticket or pass for plays/concerts/sports events. Hospitality and entertainment may also qualify as a gift unless they fall within reasonable bounds of value and occurrence.

Public Official

- A "Public Officials" would include the following:

KKharzigani

- Any person holding a legislative, executive or administrative office of the government, or acting in the official capacity for or on behalf of a legislative, executive, or administrative office of the government, whether appointed or elected, whether permanent or temporary, whether paid or unpaid; any person in the service or pay of the government or of a corporation established by or under a central, provincial or state statute, or an authority or a body owned or controlled or aided by the government or a government company or is remunerated by the government by fees or commission for the performance of any public duty;
- Any judge, including any person empowered by law to discharge, whether by himself/herself or as a member of any body of persons, any adjudicatory functions.
- Any person authorised by a court of justice to perform any duty, in connection with the administration of justice, including a liquidator, receiver or commissioner.
- Any person who performs a public duty, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the country and as applied in the pertinent area of law;
- Any elected or appointed officers or employees of public international or multilateral organizations, and
- Any other person who is considered as public official according to applicable laws and regulations.

Facilitation payment

- "Facilitation Payments" are unofficial payments made to Public Officials to secure or expedite the performance/ non-performance of a routine or necessary action. They are sometimes referred to as 'speed' money or 'grease' payments or 'good-will money'.
- The payer of the facilitation payment usually already has a legal or other entitlement to the relevant action.
- "Kickbacks" are typically payments made in return for a business favour or advantage.
- "Board" means the Board of Directors of the Company.
- "Protected Disclosure" means a concern raised by an employee or group of employees of the Company, through written communication and made in good faith which discloses or demonstrates information about an unethical or improper activity under the title "ABAC Policy" with respect to the Company. It should be factual and not speculative or in an interpretation/conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern.
- "Compliance Officer" is a professional responsible for ensuring that the Company adheres to laws and regulations related to bribery and corruption. This individual is responsible for developing and implementing policies, procedures, and controls to prevent and detect bribery and corruption within the organization.

K Kharigani

5. General Principles

Bribery & Corruption

- Employees must not engage in any form of bribery or corruption, either directly or through any Third Party (i.e., employees should neither accept nor offer/give any bribe and enter into any corrupt activity).

Gift, Hospitality and Entertainment

- Employees must not offer or give any gift, or hospitality or entertainment: which could be regarded as illegal or improper or unreasonable, or which violates the recipient's policies; or to any public employee or government officials or representatives, or politicians or political parties; or which is not in compliance with the Company's Gifts & Hospitality Policy
- Employees should not accept any gift, or, hospitality or entertainment from our business partners if: it is in cash; or there is any suggestion or possibility or possibility that a return favour will be expected or implied it might compromise or appear to compromise their objective assessment

Facilitation payments and kickbacks

- Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to. Our strict policy is that facilitation payments must not be paid.

Political Contributions

- We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

Charitable contributions

- Charitable support and donations are acceptable (and indeed are encouraged), whether of in- kind services, knowledge, time, or direct financial contributions (except contributions in cash).
- However, employees must be careful to ensure that charitable contributions by or on behalf of the Company, are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices.
- Adequate due diligence is conducted on the entity and the key personnel to ensure that Company is not exposed to any risk. This process must include a background check on the entity and the key individuals and their relationships with Government
- Entities and Government Officials, politically exposed persons, if any. The process must also attempt to establish the organization's track record and reputation.

KKharingani

- No donation must be offered or made by or on behalf of the Company without the prior joint approval of the Compliance Officer, CFO and CEO. A register must be maintained by the Compliance Officer to record all charitable contributions and approvals taken (refer **Annexure E** for the format of disclosure).

Interaction with Customers

- Where an Employee is responsible for relationships with customers, she/he may entertain customers for bona-fide purposes only in accordance with Company's Gifts & Hospitality Policy. Records of such entertainment should be maintained as per the Gifts & Hospitality Policy.
- In the normal course of business, discounts and rebates are offered to customers in both the private and public sectors. While this is common industry practice, the wide variety of arrangements and the relative complexity of some of them creates a degree of risk that such arrangements could be used to disguise improper inducements to individual customer representatives (for example, selective dissemination of the fact that free products are being provided), and consequently great care needs to be exercised in the deployment of such arrangements.

Dealing with Third Parties

- 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 Third Parties.
- All dealings with Third Parties shall be carried out with the highest standards of integrity and in compliance with all relevant and applicable laws and regulations. All Employees must follow our Company's processes and adhere to the system of internal controls.
- Third Party selection should never be based on receipt or expectation of a gift, hospitality, payment or favour of any kind or manner.
- The following should be kept in mind prior to engaging a Third Party:
- Appropriate due diligence is conducted and properly documented.
- Appropriate anti-bribery and anti-corruption provisions and relevant policies are incorporated in the contracts, including the right to audit, as well as a clause on termination, if the partner/party fails to abide by the anti-bribery and anti-corruption terms.
- Formal written commitment is sought from the Third Party to ensure compliance to these standards.
- The methodology, thresholds and classifications for the Due Diligence process should be referred from the Vendor Onboarding & Due Diligence policy.

KKhazigani

Sponsorships

- Sponsorships are closely allied to the various types of community / business activities undertaken by our Company. These could range from sponsoring educational scholarships to local sports teams. Any sponsorship must be for genuine business or charitable objectives without any element of quid pro quo. Any such sponsorship must be transparent, duly approved, properly documented and duly reported as per our Company's applicable policies **(refer Annexure E)**

Inspections, Fines and Penalties

- If a Government Official arrives at Company premises including the charging stations, branch offices etc., to conduct an inspection, Company personnel should intimate his reporting manager about the visit and purpose thereof. The following principles should be followed by the respective employee and reporting manager:
- No payments should be made in Cash to the visiting Government Official under any circumstances.
- No payments should be made before obtaining advice from the Compliance Officer and the CEO, and in his/her unavailability, from the Company's CFO or MD.
- If any expenses including any meals, travel or lodging are incurred during the inspection, these expenses must be recorded and must be consistent with this policy & the Gifts & Hospitality policy. The expenses incurred must be permissible under all applicable laws.
- In certain circumstances, fines and penalties are imposed on the Company by a Government Entity/ Inspection Officer in connection with operations of the Company's premises which may include charging stations, branch offices, warehouses, if any, and/or other facilities for purported violation of regulations.
- All departments should maintain a register of such inspections, fines, and penalties (refer **Annexure D**) which can be collated and reviewed by the Compliance officer on a half-yearly or yearly basis.
- A copy of any notice pertaining to fines and penalties should be sent to the Compliance Officer. Upon approval from the Compliance Officer, fines and penalties shall be paid directly to the Government Entity from the Company's corporate office via wire transfer or cheque, and a receipt or other written acknowledgement of the payment shall be obtained from the Government entity.
- The CEO & CFO needs to be informed of any instance where a fine/ penalty is over INR 50,000 (Rupees fifty thousand only). Further, such intimation should be given to Compliance Officer within 2 working days of getting a notice of the penalty if any such fines/ penalties are to be paid by the Company.
- Any deviations from this procedure must be approved in advance and in writing by the Compliance Officer.

K Khatiyani

6. Your responsibilities

- Employees should familiarise themselves with this ABAC Policy and other policies, procedures and controls like Gifts and Hospitality through participation in training sessions made available or guidelines issued by the Company from time to time.
- Employees must comply with this ABAC Policy and ensure that our Company's procedures and measures to mitigate ABAC risks are upheld and strengthened.
- Whenever faced with a doubt on this ABAC Policy, or about any act that can be perceived to be a potential breach of this ABAC Policy, the Employee shall consult the Compliance Officer /MD/CFO/CEO.
- Employees are required to ensure that all expense claims relating to hospitality, gifts, charitable donations or payments made to Third Parties are submitted in accordance with applicable policies and that all such expense claims specifically record or state the reason for such expenditure.
- Employees, who are in managerial positions, shall ensure that their team members are familiar with this ABAC Policy and other related policies herein. They shall guide and ensure that the guidelines in this ABAC Policy are upheld and adhered to by their team members and the Third Parties working with them.
- It will be the duty of each Employee to report any non-compliance or any indicators of potential bribery/corruption/unlawful activity or any Red Flag indicators (refer **Annexure B**) to the CEO/ Compliance Officer/MD/CFO so that necessary action can be taken by the Company promptly to mitigate the risks and other consequences arising therefrom.
- Employees shall provide full cooperation for any enquiry or investigation conducted or to be conducted by the Company for potential violation of this ABAC Policy.
- 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" to facilitate or conceal improper payments.
- Employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review. Such records should be maintained and reviewed by the Compliance Officer and reported to the CEO/MD for any concerns, on timely basis.
- Employees must follow all applicable laws and regulations, including the Prevention of Corruption Act, Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. The list and key aspects of "Relevant Regulations" are provided in **Annexure A**

7. Protection

KKhatiyani

- Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions of these actions. We aim to encourage protected disclosures and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

- Employees may also raise concerns or queries through the Whistle-blower portal at www.chargezone.tip-offs.in.
- We are committed to ensuring no one suffers any detriment owing to their refusal to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future.
- Detrimental treatment includes dismissal, disciplinary action, harassment, retaliation, threats or other adverse/unfavourable treatment connected with raising a concern.
- If you believe that you have suffered any such treatment, you should inform the Compliance Officer or such other members of the Company as per the defined escalation matrix provided in the Grievance Redressal Mechanism.

8. Maintaining Confidentiality

- ChargeZone expects individuals involved in the review or investigation to maintain complete confidentiality. Disciplinary action may be initiated against anyone found not complying with the below requirements:
- Maintain complete confidentiality of the matter.
- The matter should not be discussed in social gatherings or with individuals who are not involved in the review or investigation of the matter.
- The matter should only be discussed only to the extent or with the persons required for the purpose of completing the investigation.
- Ensure confidentiality of documents reviewed during the investigation should be maintained.
- Ensure confidentiality of subject, protected disclosure, investigation team and witnesses assisting in the investigation

9. Training and communication

- Training on this Policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be mandated to formally share their conformance to this policy on an annual basis (refer **Annexure C**).
- Compliance Officer should ensure that regular and relevant on-going training and awareness sessions are made available to Employees in relation to this ABAC Policy.

KKhariyani

- Our zero-tolerance approach to bribery and corruption must be communicated to all Third Parties at the outset of our business relationship with them and at appropriate intervals thereafter. Trainings may be extended to Third Parties as per their identified risk profile.
- The ABAC policy cannot be effective unless it is properly communicated to employees. Employees shall be shared this policy through email at least twice in a year and the policy should be available on the company intranet or the HRMS portal for reference.

10. Enforcement and disciplinary action

- The Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Compliance Officer has primary responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation.
- Any employee who breaches this policy will face disciplinary action, which could result in dismissal. We reserve our right to terminate our contractual relationship with any other individual or organisation if they are in breach of this policy.
- Bribery is a criminal offense. Employees will be accountable whether they pay a bribe themselves or if they authorize, assist, or conspire with someone else in contravention of the anti-bribery and anti-corruption laws. Punishments for violating the law against an individual includes imprisonment, probation, and monetary fines (which will not be paid by the Company). For example, imprisonment under the Prevention of Corruption Act ranges between 3 years and 7 years, along with a fine (there is no limit on the maximum fine payable).

11. Monitoring and review

- The Compliance Officer shall oversee governance and compliance with this ABAC Policy.
- The Compliance Officer and CFO will monitor the effectiveness and review the implementation of this policy regularly considering its suitability, adequacy, and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to a compliance audit once in a year to provide assurance that they are effective in countering bribery and corruption.
- The Compliance officer shall submit the Compliance Audit report in the Board on an annual basis, within four weeks of completion of audit.
- Employees are invited to comment on this policy and suggest ways in which it might be improved.

K Khargiyani

12. Right to Amendment and Intimation

- The Company reserves its right to modify or amend any part of this policy in whole or in part at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them in writing.
- The Compliance Officer/ HR department shall be responsible for intimating to all Directors and Departmental heads (HoDs) of any changes in this policy. This policy as amended from time to time shall be disclosed by the Company on its website and in the Board's report.

TecSo ChargeZone Limited

KHariyani

Mrs. Kinnari Hariyani

Director

ANNEXURE A - RELEVANT REGULATIONS

The United States Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), the Prevention of Corruption Amendment Act 2018 and many other Anti-Bribery and Corruption (ABAC) laws and regulations around the world make it clear that bribery and corruption is prohibited and illegal. FCPA and UKBA are also applicable to Indian entities, which are directly/indirectly owned/controlled by entities based out of United States or United Kingdom. Violation of these regulations lead to fines, penalties, reputational damage, and in some cases criminal liability.

The key provisions of these regulations have been summarized below. For more information on these regulations and prevalent regulations in the geography of operations, it is advisable to refer to the relevant government websites or seek guidance from legal experts.

I. Foreign Corrupt Practices Act (FCPA)

The FCPA was enacted in the United States in 1977 and contains anti-bribery and accounting provisions. The anti-bribery provisions prohibit United States persons and businesses (domestic concerns), United States and foreign public companies listed on stock exchanges in the United States or that are required to file periodic reports with the Securities and Exchange Commission (issuers), and certain foreign persons and businesses acting while in the territory of the United States (territorial jurisdiction) from making corrupt payments to foreign officials to obtain or retain business.

The accounting provisions require issuers to make and keep accurate books and records and to devise and maintain an adequate system of internal accounting controls. The accounting provisions also prohibit individuals and businesses from knowingly falsifying books and records or knowingly circumventing or failing to implement a system of internal controls. The Department of Justice (DOJ) and the Securities and Exchange Commission (SEC) are FCPA enforcement authorities. The FCPA provides for different criminal and civil penalties for companies and individuals in case of violations.

General principles of corporate liability apply to the FCPA. Thus, a company is liable when its directors, officers, employees, or agents, acting within the scope of their employment, commit FCPA violations intended, at least in part, to benefit the company. Similarly, just as with any other statute, DOJ and SEC look to principles of parent-subsidiary and successor liability in evaluating corporate liability. Although the FCPA's accounting provisions are directed at "issuers," an issuer's books and records include those of its consolidated subsidiaries and affiliates. An issuer's responsibility thus extends to ensuring that subsidiaries or affiliates under its control, including foreign subsidiaries and joint ventures, comply with the accounting provisions.

K.Kharizani

II. U.K. Bribery Act (UKBA)

The Bribery Act 2010 of United Kingdom (UK) came into force on 1 July 2011. The Act contains two general offences covering the offering, promising or giving of a bribe (active bribery) and the requesting, agreeing to receive or accepting of a bribe (passive bribery). It also sets out two further offences which specifically address commercial bribery. Section 6 of the Act creates an offence relating to bribery of a foreign public official in order to obtain or retain creates an offence relating to bribery of a foreign public official in order to obtain or retain business or an advantage in the conduct of business, and section 7 creates a new form of corporate liability for failing to prevent bribery on behalf of a commercial organization.

Section 12 of the Act provides that the courts will have jurisdiction over the offences committed in the UK, but they will also have jurisdiction over offences committed outside the UK where the person committing them has a close connection with the UK by virtue of being a British national or ordinarily resident in the UK, a body incorporated in the UK or a Scottish partnership. A commercial organisation found guilty of an offence may be levied fine. An individual found guilty of an offence may face imprisonment of up to 10 years or a fine, or both.

III. Prevention of Corruption Amendment Act, 2018, India

The Prevention of Corruption Act, 1988 (PC Act) was enacted to prevent corruption in government departments and to prosecute and punish public servants involved in corrupt practices. An amendment was enacted (Amendment Act) and brought into force on 26 July 2018.

The Amendment Act provides that any public servant who obtains or accepts or attempts to obtain from any person, any 'undue advantage', either for himself or for any other person, with the intent to perform or cause performance of public duty improperly or dishonestly or to forbear or cause forbearance to perform such duty, shall be punishable with imprisonment for a minimum term of 3 (three) years and maximum of 7 (seven) years and shall also be liable to fine. The Amendment Act has defined 'undue advantage' to mean any gratification (not limited to pecuniary gratifications or to gratifications estimable in money), other than legal remuneration.

As per the Amendment Act, giving an undue advantage by a person to a public servant is considered an offence punishable with imprisonment upto 7 (seven) years or fine, or both. However, if a person is forced / coerced to give an undue advantage but reports the same to the concerned authority within 7 (seven) days of doing so, he shall not be liable for the same.

KKhargani

The Amendment Act prescribes the offence relating to bribing a public servant by a commercial organisation, wherein a commercial organisation has been defined to include not just a body or partnership incorporated and carrying on business in India, but also a body or partnership incorporated or formed outside India but carrying on business in India. The Amendment Act has a specific provision for offences committed by commercial organizations and persons associated with it. It provides that if a commercial organisation commits any of the offences listed out in the PC Act, then every director, manager, secretary or other officer with whose 'consent or connivance' the offence was committed, is to be made liable as specified under the PCA.

KKhazingani

ANNEXURE B – RED FLAG INDICATORS

While an exhaustive list cannot be provided, set out below are indicative questionable transactions or situations that an Employee should be careful about – which, when appearing together or individually, should raise a 'Red Flag' to the Reporting Manager or the Compliance Officer:

- A contract requires the use of a Third-Party consultant where the Third Party's principal or owner is a government official, e.g., appointing a partnership firm where one of the partners is also a DISCOM employee
- The business lacks qualifications or resources i.e. the potential business partner does not appear capable of performing the services being offered. Sham service contracts, under which corrupt payments are disguised using a consulting agreement or other arrangement are typical modalities for indulging in bribery or corrupt activities.
- e.g., use of an unlicensed Electrical Contractor, who provides an assurance of a quick electricity connection
- Any potential partner who provides guarantees of success or claims to have the ability to obtain licenses or other government approval without providing a description of a legitimate manner by which those goals will be accomplished.
- e.g., an Electrical Contractor whose unique proposition is their "expertise in government liaising"
- Transactions involving unusual payment patterns or financial arrangements. Accordingly, a request to pay unusually high commissions is a warning sign of possible corruption. A request to deposit commissions in multiple bank accounts, perhaps in offshore banks, also justifies additional scrutiny.
- A potential Third Party who refuses to accept an ABAC or anti money laundering clause in the proposed contract.
- Based on pre-acquisition due diligence, it becomes apparent that the potential counterparty has a reputation for offering bribes or violating other laws or indulging in unusually structured transactions.
- Inflated payouts to, or questionable role in the project of potential counterparty or its affiliate.
- A proposed Third-Party resist or fails to provide details of parentage or has undisclosed principals, associates or subcontractors with whom it splits fees.
- A Third-Party counterparty refuses access to its books and records were requested under the proposed contract.
- A Public Official suggests, requests, urges, insists, or demands that a particular Third Party, company, or individual be selected or engaged, particularly if the official has discretionary authority over the business at issue.
- e.g., an official at the CEIG office insists that a specific Contractor be used, in order to obtain the requisite approvals

KKhargiyani

- The Third Party insists on dealing with government officials without the participation of the Company.
- e.g., one of the Company's Contractors insists that the Execution team not join them during the settlement of a billing dispute, and that he would "take care of it quietly".
- The fee, commission, or volume discount provided to the Third Party is unusually high compared to the market rate.

KKhazigani

ANNEXURE C – DRAFT DECLARATION BY EMPLOYEE

I, the undersigned do hereby certify that,

- I have read and understood this ABAC Policy of the Company.
- I also affirm to comply with the requirements of this ABAC Policy, during my employment with the Company.
- I will not engage in, nor attempt to engage in any acts of bribery or corruption, as understood in this ABAC Policy, while discharging my duties for or on behalf of the company or in my personal capacity during the term of my employment with the company.
- Company or in any personal capacity during the term of my employment with the Company.
- In case I come across any instances of non-compliance with this ABAC policy, I shall promptly highlight such non-compliance to the relevant authorities in the Company.

KKhariyani

Employee Name -

Employee code -

Designation -

Department -

Date -

Signature -

ANNEXURE D – GOVERNMENT OFFICIAL INSPECTION REGISTER

Date	Name of the official(s)	Official(s) Title	Official(s) Organisation	Purpose of Visit	Name and designation of person attending the Government Officer	Department/ Functional Unit	Amount and Details of fines/ penalties (if any) levied by the Government Officer

Kkharjyani

ANNEXURE E – FORM FOR CHARITABLE CONTRIBUTION/ SPONSORSHIPS

#	Particulars	Details
A.	**Expense Information**	
1	Expense Type (Charitable Contributions/ Sponsorship)	
2	Estimated expense	
3	Date of expense	
4	Purpose	
5	Is there a contract with the entity or company that requires this expenditure? (if Yes, please attach the draft copy)	
B.	**Recipient of Charitable Contribution/ Sponsorships**	
1	Name of the Individuals (if applicable)	
2	Organisation	
3	Address	
4	Contact Number	
5	Email ID	
C.	**Government Official/Organization (having beneficial interest in the concerned charitable organization or sponsored organization or being related with concerned recipient)**	
1	Name	
2	Organisation	
3	Department	
4	Designation	
5	Contact Number	
6	Email ID	
7	Has the Government Official made any decisions with regards to the Company in past 12 months? (if Yes, please explain.)	
8	Is the Government Official expected to make any decisions with regard to the Company in next 12 months? (if Yes, please explain.)	
D.	**Responsibilities of respective Department/ Function**	
	Department/ Function requesting for Charitable Contribution/ Sponsorships should ensure that:	
1	Contract/ Disbursement Letter is executed for the Charitable Contributions/ Sponsorships with a clearly defined purpose, amount, account to which such amount was transferred and the necessary ABAC laws.	
2	Adequate due diligence is conducted on the entity and the key personnel to ensure that Company is not exposed to any risk. At the minimum, this process must include a background check on the entity and the key individuals and their relationships with Government Entities and Government Officials, politically exposed persons, if any. The process must also attempt to establish the organization's track record and reputation.	
3	No contributions are made in cash.	
E.	**Responsible Department/ Function Certification**	

KKhazigani

I have disclosed all information that I believe is relevant to the Charitable Contribution/ Sponsorships and certify that the business expenditures complied (or will comply) with the Company's Anti-Corruption Policy and applicable anti-corruption laws.	
Name	
Signature	
Title	
Name of Department/ Function	
Date	
F.	**Approvals**
1	**Department/ Function Head**
Name	
Signature	
Date	
2	**Compliance Officer**
Name	
Signature	
Date	
3	**MD (applicable, if the expense amount is INR 5 lakhs or more)**
Name	
Signature	
Date	

Kkharigani