

**BHARAT FORGE**



## Anti-Corruption & Anti-Bribery Policy

<b>Name of the Document</b>	<b>Anti-Corruption &amp; Anti-Bribery Policy</b>
<b>Version</b>	<b>1</b>
<b>Issuing Authority / Document owner</b>	<b>Human Resources</b>
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## INTRODUCTION

Bharat Forge is one of the leading forging companies in the world. Being one of the global leaders in metal generating with a transcontinental presence, our business is dependent on the trust and confidence of our consumers.

Our Company is committed to setting up utmost standards for transparency and accountability in its affairs through behaving responsibly, equitably, and with integrity in all of its business dealings and relationships wherever it operates. We operate with the highest moral and ethical standards and are committed to working with zero tolerance for bribery and corruption.

## PURPOSE AND GOAL OF THE POLICY

The purpose of this policy is to promote a culture of compelling compliance with anti-corruption laws and regulations.

Designate responsibilities throughout the organization's business operations in observing and upholding our position on bribery and corruption in all dealings, and Provide information and guidance on how to recognise and deal with bribery & corruption issues.

## SCOPE AND APPLICABILITY

This policy applies to all individuals working at all levels and grades for Bharat Forge Limited, its subsidiaries, joint ventures and affiliates anywhere in the world (collectively referred to as the "Company").

This includes senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, casual workers and agency staff, volunteers, interns, persons acting on behalf of the Company, agents, sponsors, or any other person associated with us, or any of our subsidiaries, joint ventures or their employees, wherever located (collectively referred as "Associates" in this policy)

This policy sets out the minimum standards to assist Associates to set up adequate procedures to ensure the prevention, deterrence and detection of bribery and other corrupt business practices in the conduct of the operations and business activities, directly or indirectly through a third party, to or from any individual, or associates, officials in the private or public sector, government officials, agents, customers and suppliers.

When applicable local laws are stricter than this policy, such rules must comply with Bribery & Corruption.

A bribe is anything of value, including money, gifts and entertainment, other business courtesies, hospitality, or personal gratification given, offered, or received in an attempt to influence a person's behaviour to obtain or retain business or to secure an unfair benefit or advantage.

Corruption is dishonest behaviour by those in positions of power, such as managers or Government Officials. Corruption can include giving or accepting bribes or inappropriate gifts, under-the-table payments or benefits, diverting funds, laundering money, and defrauding investors.

## PROHIBITIVE PRACTICES

It is prohibited for Associates to give, promise to give, or offer payment, gift or hospitality to secure or award an improper business advantage. Give, promise to provide, or offer a price, estate or hospitality to a government official, agent, or representative to facilitate, expedite, or reward any action or procedure. Accept payment from a third party knowing or suspecting it is offered with the expectation that it will obtain a business advantage for them. Induce another individual or associate to indulge in any acts prohibited in this policy.

Threaten or retaliate against another associate who has refused to commit a bribery offence or raised concerns under this policy.

Give or accept any gift where such gift is or could reasonably be perceived to be a contravention of this policy and applicable law, or engage in any activity that might lead to a breach of this policy.

This Policy does not prohibit typical and appropriate hospitality given or received, if reasonable, made in good faith in compliance with the Company's Code of Conduct & Ethics for Employees and various advisories issued from time to time under the preceding.

## **RESPONSIBILITY OF ASSOCIATES**

Associates must ensure that they have read and understood this policy and must at all times comply with the terms and conditions of this Policy and the following related policies:

## **CODE OF CONDUCT & ETHICS FOR EMPLOYEES**

## **WHISTLE BLOWER POLICY**

Prevention, detection and reporting of corruption are the responsibility of all those working for us or under our control. All Associates are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

All associates are expected to comply with the laws, rules, and regulations of the countries we operate in. That applies to their day-to-day activities and our internal policies, standards, and procedures.

Any associates who breach any of the terms of this Policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate a contractual relationship with other associates and other associated persons, as the case may be, if they breach any of the terms and conditions of the Policy.

## **RAISING CONCERNS OR COMPLAINT**

Associates are encouraged to raise concerns about any actual or suspected bribery and corruption cases at the earliest possible stage. Where anyone believes the Policy is not being complied with or is being asked to carry out any act, not in compliance with this Policy, these concerns must be raised immediately with the immediate superior. If the direct supervisor is not the appropriate person, then the employee's concerns must be brought directly to the attention of the Human Resource Department. Any such concern should be reported by following the procedure set out in the Whistle Blower Policy of the Company, which is available on the Company's website.

## **RECORD KEEPING**

The Company will keep financial records and have appropriate internal controls, which will evidence the business reason for making payments from third parties.

Associates must declare and keep a written record of all hospitality or gifts or expenses incurred to third parties submitted by the Company's applicable policy and the reason for such expenditure. Associates shall further ensure that all expense claims shall comply with the terms and conditions.

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.

## TRAINING AND COMMUNICATION

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all existing associates. If you have any queries about this policy, you should contact your reporting manager.

As part of the prevention, identification, and detection of Anti-corruption issues, training shall be conducted throughout the Company. The employees would be required to complete training to maintain their conduct and adhere to this policy.

The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate after that. Wherever possible, all third parties should be sent a copy of this policy at the outset of the business relationship.

## MONITORING

The head of the Human Resources Department of the region has primary day-to-day responsibility for implementing this policy. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand the procedure and, if necessary and appropriate, are given adequate and regular training on it.

The head of the Human Resources Department of the region will monitor the effectiveness and review the implementation of policy, regularly considering its sustainability, adequacy and usefulness. Internal Control Systems and procedures will be subject to regular audits to ensure that they effectively counter bribery and corruption.

All associates are responsible for the success of this policy and should ensure they use it to disclose any suspected wrongdoing.

The Audit Committee of the Board has overall responsibility for ensuring this policy complies with our legal and ethical obligations and all those under our control. The Compliance Officer shall periodically report to the Audit Committee any concerns or complaints received under the policy and action taken in that regard.

## AMENDMENTS

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, this policy, in whole or in part, shall stand modified/amended from time to time, without any further action on the part of the Company, as and when there would be any statutory modification(s) / amendment(s) / revision(s) to the applicable provisions to it.