



Effective : 31st March, 2017  
Supercedes : NA

Anti-bribery and Anti-Corruption Policy

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Dated 31<sup>st</sup> March 2017

Approved By

Name MAYANK SINGH

Signature



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## Anti-bribery and Anti-Corruption Policy

### 1. Introduction

PI Industries Limited (hereinafter referred as to 'PI' or 'the Company'), has a well-earned reputation for honesty and integrity in its business practices which it wishes to maintain.

Bribery and corruption of all kinds undermine trust; they inhibit social and economic development and undermine fair competition. This Anti-Bribery and Anti-Corruption Policy ('Policy') aims to reflect the commitment of PI Industries to conduct all of its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforcing its business practice wherever it operates.

### 2. Purpose

The purpose of the policy is to

- Communicate and clarify the Company's Policy regarding fair and clean business practices and the process followed by the Company for investigation and acting on allegations and instances of non-compliance with or violation of the Policy stated herein.
- Provide guidance to Company's representatives, employees and external stakeholders on how to identify and respond to situations which are potentially non-compliant with the Policy.
- Ensure compliance with the 'Anti-Bribery and Corruption Laws'

### 3. Scope

This Policy applies to:-

- All individuals working for PI, including directors, senior executives, employees (whether permanent, fixed-term or temporary), Third Parties (as defined below) hereinafter referred as to 'Company's representatives'.
- Consultants, contractors, trainees, casual workers, interns, agents, or any other person associated with PI including its subsidiary companies (hereinafter referred to as "Third Parties").

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**4. Definitions**

**a) Anti-Bribery and Anti-Corruption Law(s)**

Law(s); mean to the extent applicable to a Company, Company's representatives, or affiliates (as applicable) from time to time; including but not limited to the Prevention of Money Laundering Act, 2002, Prevention of Corruption Act, 1988 and any other similar laws or rules or regulations in any other jurisdictions (including globally) as may be enacted or amended from time to time.

**b) Bribery**

Bribery is an inducement or reward offered or promised or provided in order to gain any commercial, contractual, regulatory or personal advantage through improper performance. It can be in form of money, unreasonable gifts, entertainment or hospitality, unwarranted rebates or excessive commissions, kickbacks, unwarranted allowances or expenses, political contributions, charitable contributions with specific intent, uncompensated use of company services or facilities, unwarranted priority treatment accorded to a particular customer etc.

**c) Corruption**

Corruption is the abuse of public or private office and its related employees, officials for personal gain.

**d) Facilitation Payments**

Facilitation Payments are small payments made to secure or speed up routine legal government actions, which are not otherwise officially required.

**e) Gifts**

Gift, is an object given willingly to someone without payment.

**f) Kickbacks**

Kickbacks are illicit payments made in return for facilitating a transaction or appointment.

**g) Managing Director**

Managing Director means Managing Director of the Company.

**h) Vigilance and Ethics Officer**

Officer defined in the Company's Whistle Blower Policy.

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### 5. Policy Statement

PI is committed to complying with anti-bribery and anti-corruption laws.

Company Personnel are prohibited from giving or offering bribes, kickbacks, or similar payment or consideration of any kind to any person or entity in order to influence official acts or decisions of that person or entity, obtain or retain business to the Company.

Company personnel are prohibited from accepting or receiving bribes, kickbacks, or similar payment or consideration of any kind from any person or entity which is intended to influence official acts or decisions of that person or entity, obtain or retain business to the Company.

### 6. Guidance on Adherence to the Policy

In order to adhere to the Policy, all the Company's representatives and Third Parties must follow the below:

#### A. Recognition of Bribery/Corruption

Company's representatives may encounter certain scenarios that may arise during the course of employment of PI, which may raise concerns under Anti-Bribery and Anti-Corruption laws. These instances must be reported promptly to the Company's representative's Manager and / or Vigilance and Ethics Officer. The following is an illustrative but not an exhaustive list of such circumstances:-

- Becoming aware that a Third Party engages in, or has been accused of engaging in, objectionable business practices, which is in contravention with the provisions of this Policy.
- Learning that a Third Party has a reputation for paying bribes
- Third party insisting on receiving a commission or fee payment before committing to sign up to a contract with PI, or carrying out a government function or process for PI.
- Third party requesting payment in cash and/or refuses to sign a formal contract or to provide an invoice or receipt for a payment made.





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- Third party requesting that payment is made to a geographic location different from where the Third Party resides or conducts business or to an entity different from itself or the contracting party.
- Third party requesting for provision of employment or some other advantage to a friend or relative as a quid pro quo to providing a service to PI.
- Receiving an invoice from a Third Party that appears to be non-standard or customized.
- Offer of an unusually generous Gift or lavish hospitality by a Third Party.

#### B. Observance

It is the responsibility of the Company's representatives (including all persons/officials covered under the Policy) to abide by the Policy.

#### C. Not accepting Gifts, Kickbacks, and Facilitation etc.

No gifts of any kind that are offered by Third Parties shall be accepted by the company representative.

If any such gifts have been received, the same should be handed over to the Site / Office Administration Head for donation to charity.

However, cards, thank you notes, certificates, foods and beverages equivalent to INR 1,500/- (Rupees One Thousand and Five Hundred Only) or less are treated as exempt.

#### 7. Raising Concerns & Protection

Instances / suspicion of non-compliance with the policy should be brought to the attention of the Vigilance and Ethics Officer of the Company in writing.

The Company will ensure that no harassment, victimization, unfair treatment will be meted out to the person who raises such concerns under this Policy. The Vigilance and Ethics Officer shall ensure that the identity of the such person be kept confidential.



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### 8. Investigation

On receipt of a written complaint as above, the Vigilance and Ethics Officer shall conduct an investigation and recommend suitable actions.

If it concluded that the allegations are false, frivolous or vexatious, he may recommend appropriate disciplinary action against the complainant.

### 9. Consequences

If a Company's representative wilfully violates Anti-Bribery and Anti-Corruption laws or this Policy, he / she are liable to disciplinary action including termination of employment.

PI expects all Third Parties doing business with PI to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. PI requires all Third Parties to co-operate and ensure compliance with these standards.

### 10. Redressal

The person, against whom such a complaint is filed if aggrieved with the decision of the authority in the said matter, can take recourse and appeal to the Managing Director for the same. The decision of the Managing Director shall be final in this regard.

### 11. Training and Communication

Dissemination of this Policy for new joinee(s) shall be carried out at the time of induction. Policy would be made available on company website and intranet.

All Third Parties are required to provide adequate training to educate and spread awareness among its employees, on the obligation to comply with Anti-Bribery and Anti-Corruption laws, regulations and this Policy.

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**12. Implementation in Agreements:**

All the agreements which are entered into by Company will mandatorily have clause w.r.t. 'Compliance to Company's Policy'; which is as below:

Service Provider / Company / Distributor warrants that Service Provider / Company / Distributor shall at the all times comply with all the applicable laws and regulations related to the Services mentioned in this Agreement. Service Provider / Company / Distributor shall fully comply with Anti-Bribery Laws at all the times.

**13. Responsibility**

Management will have the overall responsibility for ensuring the compliance to this policy and will monitor the effectiveness of the policy.

**14. Exceptions**

Any exceptions to the Policy must be approved by the Vigilance and Ethics Officer nominated by the Company as laid down in the Whistle Blower Policy of the Company.

**15. Amendments**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time. Any and all changes will be duly communicated to the entire Company, Company's representatives and Third Parties.