

**SAPO 004 -ANTI - BRIBERY & CORRUPTION POLICY & PROCEDURE FOR INVESTIGATION AND DISCOURAGEMENT OF UNETHICAL BEHAVIOUR**

The organization conducts the business ethically without bribery, corruption or any type of fraudulent Business Practice. It always has been and continues to be the intent of the Company that its employees maintain the highest ethical standards in their conduct of Company affairs. Employees shall neither seek nor accept for themselves or others any gifts, favours or entertainment.

In order to carry out the business ethically, the following activities are strictly forbidden

- Bribing to Government officials for obtaining legal certificates.
- Bribing to third party agencies like inspection and audit agencies for getting advantages or passing the inspection.
- Obtaining bribe, commission, gifts, favours, entertainment and payments in lieu of indirect benefits received by employees from Suppliers / Sub contractors / Sub suppliers.
- Any type of or level of entertainment or indirect benefits obtained from the suppliers / subcontractors
- Use of customer's property or supplier's property, etc
- Payment of travel and accommodation expenses to the buying house personnel / inspection agency personnel
- Hidden price fixing for availing kickbacks in purchases.
- Tips or bribe is given to the Customers or their authorized buying house for getting the order.

**MR** is responsible for implementing Standards concerning Business Practices.

- Payments to government personnel to expedite the rendition of routine governmental actions are discouraged.
- Employees should avoid any situation which involves or may involve a conflict between their personal interests and the interests of the Company.
- Agreements for the Company to pay commissions, rebates, credits, discounts or allowances should be in writing. When this is not feasible, the payment arrangement should be supported by an explanatory memorandum for file prepared by the approving business and/or function and reviewed by **MR**.
- Employees shall not give or release, without proper authority, to anyone not employed by the Company, or to another employee who has no need for information, data or information of a confidential nature obtained while in Company employment

- Strict adherence to this policy will protect the Company and its employees from criticism, litigation or embarrassment that might result from alleged or real conflicts of interest or unethical practices. Any employee who is aware of or suspects illegal activity, fraud or any other violation of the Company's ethical standards must report his or her concerns.

A system is in place for confidentially reporting and dealing with unethical Business Practices without fear of reprisals towards the reporter.

- SMR will conduct verification at Supplier's premises for the effectiveness of the policy.
- In order to achieve the accuracy of the issue, if required, third party will be engaged to ascertain the facts which are against this policy.
- If any supplier or subcontractor involved against this policy, further business will be stopped.
- If any employee involved for corruption and bribery, an ethical behaviour perpetrated in it's the business and sphere of influence, the matter will be investigated by the MR.
- Whoever being guilty of this kind of activities will be subjected to disciplinary action.
- If the matter is proved, action will be initiated against the concerned employee and will be as per the Legal requirements and Standing order.

### **REWARD OR INCENTIVE PROGRAM**

- That the awareness has been created to all the employees to report to the management, in the event of any bribery , corruption activities and un ethical behaviour and integrity in the facility premises, or any other place connected to the facility, or activities related to suppliers and sub contractors to be informed to the MR.
  - All employees are being taught about their duties and responsibilities in the factory facilities and steps being taken appropriately to ensure all employees are having the awareness of this program and to take initiative in this awareness.
  - In the event of any detection by any employee this kind of activities, that employee will be appraised for reward or incentive.
  - The employees are made aware of unethical, and integrity by imparting training.
  - The record of the same is maintained.
- Incentive program familiarized through display in Notice Board and respective locations.

## **BUILDING WORKPLACE BUSINESS ETHICS & INTEGRITY**

- Building workplace integrity involves developing and maintaining a professional and respectful workplace. It involves ethical leadership, active management and supervision, the right people, effective processes and confident professional reporting.
- In essence, building workplace integrity is about creating a workplace that fosters the development of high professional standards, and demonstrates the values of the organization.
- An ethical and professional workplace is the best safeguard against risks to integrity, including Unethical behaviour, improper conduct, misconduct and corruption. With this in mind, this policy has been developed to help strengthen workplace integrity its workplace integrity.
- Managers and workers are responsible for the integrity of workplaces.
  
- Managers and supervisors play an important role in shaping the ethical health of a workplace, and setting the right tone for Workers. They work closely with workers and manage their performance and development.
- As a manager, can use this toolkit to assess and monitor workplace integrity.
- Integrity monitoring may occur as part of the business planning of our facility or in response to changes to the workplace or team – such as changes in staffing or work demands.
- This toolkit is structured around the assessment of five key areas considered fundamental to building ethical health.

### **ETHICAL LEADERSHIP:**

- The extent to which managers lead by example and create a professional working environment for Employees.

### • **ACTIVE MANAGEMENT AND SUPERVISION**

- The extent to which managers take responsibility for the team, and actively manage work performance.

### • **THE RIGHT PEOPLE**

- The extent to which staff carry out their duties in accordance with the organization's expectations of them.

### • **EFFECTIVE PROCESSES**

- The extent to which risk management processes exist in the workplace, and are complied with by staff

- **CONFIDENT PROFESSIONAL REPORTING:**

- The extent to which internal reporting facilitates early detection and contributes to the continuous improvement of the organization

These five key areas are interrelated. When a workplace performs well in each, it indicates strong capacity to identify and manage integrity related issues.



Director & COO

