

HR Dept.	KALYANI TECHNOFORGE LTD	Revision 04
		Prepared Date- 01-03-2017
		Next Revision - 01-04-2025

Group Anti-Bribery and Anti-Corruption Policy



1. Definitions relevant to this Group Anti - Bribery and Anti - Corruption Policy

1.1. Bribe: Includes:

- 1.1.1. Offering, promising or giving anything of value to improperly influence another in order to obtain business or procure an action for Kalyani Technoforge Limited; or
- 1.1.2. Requesting or accepting anything of value as a reward for or as an inducement to act improperly in relation to the awarding of business by Kalyani Technoforge Limited or an action of Kalyani Technoforge Limited.

Bribes can include money, gifts, hospitality, expenses, reciprocal favors, political or charitable contributions, or any direct or indirect benefit or consideration.

- **Anti - Bribery and Anti - Corruption Officers:** Kalyani Technoforge Limited's President - Auto and Gear Business and CHRO are Kalyani Technoforge Limited's appointed Anti - Bribery and Anti -Corruption Officers.
- **Employees:** Includes all workers performing duties on behalf of Kalyani Technoforge Limited, whether or not employed directly by Kalyani Technoforge Limited.
- **Third Party / Parties:** Includes government / public officials, political parties, agents, brokers, partners, consultants, contractors, joint venture partners and other representatives performing work for the benefit of Kalyani Technoforge Limited.

2. Anti - Bribery and Anti - Corruption Policy - Responsibility of Kalyani Technoforge Limited Companies and Employees Compliance with

Law No Bribes

- Kalyani Technoforge Limited companies and **Employees** must not offer, provide request or accept, directly or indirectly, any **Bribe**, including facilitation payments, to or from any **Third Party / Parties**.

You must not make a payment to a **Third Party /Third Parties** if you know or suspect that the person may use or offer all or a portion of the payment directly or indirectly as a **Bribe**. It is your responsibility to ensure that **Third Parties** engaged on behalf of Kalyani Technoforge Limited are legitimate service providers. Before engaging any such party you are required to undertake appropriate due diligence checks. If you are in any doubt whatsoever about the legitimacy of a proposed **Third Party** you should discuss your concerns with one of the **Anti - Bribery and Anti - Corruption Officers** prior to entering into any arrangements with the **Third Party**.

Facilitation Payments

- Making a payment or gift to a government / public official (whether directly or indirectly) to encourage or induce them to obtain or retain business or some other commercial advantage for Kalyani Technoforge Limited may appear to be an acceptable practice, or may be customary in some parts of the world. However, such payments or gifts are illegal and are prohibited by Kalyani Technoforge Limited and you must not make payments regardless of local custom.
- Circumstances in which facilitation payments commonly arise include: when obtaining permits, licenses or other official documents; when obtaining import and export clearance; to provide access to facilities such as power and water etc.
- If in any doubt about whether to make a payment i.e. whether it is permitted by law, or if concerned that a payment has been made on our behalf by a third party without our instruction appropriate advice should be sought from one of the **Anti - Bribery and Anti - Corruption Officers**

3. Gifts and Hospitality

- In the normal course of business Kalyani Technoforge Limited employees shall not give or receive gifts or hospitality from any third parties. In exceptional business cases having potential business implications, approval of CHRO is mandatory.

4. Application of this Policy

- This policy applies to all **Employees** of Kalyani Technoforge Limited and **Third Parties** performing duties for or on behalf of Kalyani Technoforge Limited whether or not directly employed by Kalyani Technoforge Limited.
- This policy extends to all Kalyani Technoforge Limited's operations worldwide and **Employees** wherever located, regardless of geographical location.
- Any **Employee** who has any suspicion or reason to believe that this policy is being breached or may be breached should immediately report the matter to one of the **Anti - Bribery and Anti- Corruption Officers** whose role is to assist the Group in achieving compliance with this policy.
- All Divisions are required to maintain a register of gifts and hospitality given or received. Please contact your local HR Manager or one of the **Anti- Bribery and Anti - Corruption Officers** for a template form of such a register.

5. Consequences for Breaches of Anti-Corruption Laws

- **Consequences for individuals:** Consequences may include imprisonment, suspension and significant monetary fines. You would also be subject to disciplinary action, up to and including dismissal from the company.
- **Consequences for Kalyani Technoforge Limited:** Consequences may include the company facing unlimited fines, damage to the corporate brand and reputation of Kalyani Technoforge Limited, loss of the ability to trade in certain jurisdictions, debarment from bidding for government contracts, loss of business, legal action by competitors, litigation and substantial investigation expenses.
- In addition, under certain anti-corruption laws, the directors and senior officers of Kalyani Technoforge Limited can be held personally liable for the breaches committed by **Employees** and **Third Parties** and face significant fines and/or imprisonment.

6. Enforcement and Discipline

Kalyani Technoforge Limited views corruption and bribery very seriously. Kalyani Technoforge Limited will investigate all allegations of bribery and corruption and take legal and/or disciplinary action in all cases where it is considered appropriate. A breach of this policy may result in an **Employee** facing disciplinary action, including dismissal. Where a case is referred to the police or other law enforcement agency, Kalyani Technoforge Limited will co- operate fully with the criminal investigation which could lead to the **Employee** being prosecuted.

If you have any further questions please contact the CHRO and President – Auto & Gear Business at Kalyani Technoforge Limited Corporate office.