

	Anti-Corruption Policy	
	HR Process No.03	1st October 2022

Purpose

This Policy has been formulated in alignment with HIL's code of conduct for employees. This policy will ensure ethical, transparent and consistent business practices within the organization, consistent with the laws and regulations applicable. The purpose of this policy is to communicate clear process to ensure compliance with all applicable anti-bribery and anti-corruption laws.

Scope

This Policy is applicable to all officers, stake holders and employees (including temporary or short-term contract workers) of the Company.

Policy Framework

- No to any bribe to Government Officials or a private sector person or Company.
- No to provide any cash gifts to Government Officials or a private sector person.
- No to make facilitation payments or accept the facilitation payments of any kind for expedite official business or work.
- No to provide of receipt of gifts/entertainment or pay business travel expenses to Public Officials to Government Officials or a private sector person. However exchange of nominal gift or souvenirs of a nominal value which are customarily given on specific occasions are acknowledgeable and it must comply with this policy and all applicable anti-bribery and anti-corruption laws.
- Reasonable hospitality is admissible limited to meals as may be offered or received and only if it is reasonable and justifiable.
- Company may make charitable donations which are admissible, legal and ethical under applicable laws and practices.
- Company not entertain for any contribution to any political party or politicians.
- No to other unethical act or omission.

Definitions

- A bribe is the promise, offer or provision of a benefit in order to obtain, or as a reward for receiving, an improper advantage. These benefits can range to include gifts, entertainment, loaning of property, provision of a professional service etc.
- Facilitation payments means unofficial payment made to Government Officials or a private sector person to secure services / approvals / permits for routine business.
- Government officials is a 'public servant' as defined in the Indian Prevention of Corruption Act, 1988.

Consequences of Non-Compliance and Information Reporting:

- All employees / stakeholders are encouraged to raise concerns on non-compliance of this policy to the Managing Director.
- HIL will investigate all issues relating to corruption and bribery and take legal or disciplinary actions as may be deemed appropriate. All reports under this policy will be treated as confidential and also protects the identity of any person who reports a suspected violation.
- False reporting will be considered a violation of the code of conduct and reporter may be subject to disciplinary action.

Training & Communication:

- HR Department will provide appropriate training to employees on applicable laws, their role & importance; in order to be in conformance with the legal requirements.

Prepared & Proposed By (HR Department)	Authorized By (Subodh M. Pitkar – V.P. – HR & Admin.)
	

