



ANTI CORRUPTION BRIBERY POLICY

1. Introduction

Anusham Automotive India Pvt Ltd is committed to conducting business with the highest standards of integrity, transparency, and ethical conduct. Corruption, bribery, facilitation payments, and improper advantages undermine trust, distort fair competition, and expose the organisation to legal, financial, and reputational risks. This Anti-Corruption & Anti-Bribery Policy reflects AAIP's zero-tolerance stance toward any form of corrupt activity, whether direct or indirect, by employees, contractors, suppliers, or business partners. This policy aligns with global anti-corruption principles, ESG governance expectations, RSCI compliance requirements, and Indian anti-corruption laws.

2. Purpose

The purpose of this policy is to:

- Prevent, detect, and respond to bribery and corruption in all business dealings.
- Establish clear behavioural expectations for employees and business partners.
- Ensure compliance with legal, regulatory, ethical, and customer requirements.
- Safeguard the company's reputation, financial stability, and stakeholder trust.
- Promote a culture of integrity and accountability across the organisation.

3. Scope

This policy applies to all employees, directors, managers, contract workers, trainees, consultants, agents, intermediaries, suppliers, vendors, service providers, and any third party acting on behalf of AAIP. It covers all business transactions—domestic or international—including procurement, sales, government interactions, licensing, inspections, audits, and tendering processes.

4. Legal & Compliance Framework

This policy follows:

- Prevention of Corruption Act (India)
- Companies Act – Corporate Governance Provisions
- ISO 37001 Anti-Bribery Management System principles
- ESG Governance & Ethical Business Standards
- RSCI requirements on Ethical Business Conduct

Where applicable, international anti-bribery standards and norms may also be referenced.

5. Definitions

Bribery: Offering, giving, receiving, or soliciting anything of value to improperly influence a decision.

Corruption: Abuse of entrusted power for personal or organisational gain.



Facilitation Payment: Small, unofficial payments made to expedite routine government actions.

Kickback: Return of a portion of payment as a reward for securing business.

Conflict of Interest: A situation where personal interest interferes with professional duty.

6. Policy Statement – Zero Tolerance to Corruption

AAIPL maintains a strict zero-tolerance approach toward bribery and corruption in any form. Employees and business partners are strictly prohibited from offering, requesting, giving, or accepting bribes, kickbacks, facilitation payments, or unethical gifts. No individual may use influence, coercion, or improper incentives to secure business advantage. Any violation of this principle will result in severe disciplinary action including termination, blacklisting, or legal consequences.

7. Prohibited Conduct

Under no circumstances may employees or business partners:

- Offer or accept cash, gifts, or favours to influence decisions.
- Make unofficial payments to government officials.
- Manipulate procurement, tendering, or vendor selection.
- Offer excessive hospitality with intent to influence.
- Provide political or charitable contributions in exchange for benefits.
- Conceal transactions or falsify records.

Any suspected breach must be reported immediately.

8. Gifts, Hospitality & Entertainment

AAIPL recognises that modest hospitality may sometimes support business relationships; however:

- Gifts must be reasonable, infrequent, and non-cash.
- Hospitality must not influence or appear to influence decisions.
- All gifts above defined value must be declared.
- Cash, gift cards, luxury items, and extravagant entertainment are prohibited.

Employees must follow the organisation's Gift & Hospitality Register requirements.

9. Interactions with Government Officials

All dealings with government authorities—including inspectors, licensing officers, fire departments, PCB officials, and auditors—must be transparent, documented, and strictly compliant. Employees must NOT:

- Offer payments, gifts, or favours to obtain approvals or avoid penalties.
- Provide misleading information or falsified documents.

Only authorised representatives may engage with government bodies.



10. Procurement, Vendor Management & Third-Party Responsibility

Procurement activities are highly vulnerable to corruption. Therefore:

- Vendors must undergo due diligence and ethical compliance reviews.
- Supplier contracts must include anti-corruption clauses.
- Kickbacks or influencing vendor selection are strictly prohibited.
- Third parties acting on behalf of AAIP/HR64 must uphold this policy.

Violation by a vendor may result in immediate termination of business relationship.

11. Conflict of Interest

Employees must avoid situations where personal interest conflicts with professional duties.

This includes:

- Family members in vendor relationships.
- Financial interest in competing or supplying businesses.
- Personal relationships influencing decisions.

Conflicts must be declared and reviewed by HR or Compliance Team.

12. Record Keeping & Transparency

All transactions, invoices, receipts, contracts, and approvals must be accurately recorded.

AAIP/HR64 prohibits:

- Off-the-record transactions
- False accounting
- Concealed payments
- Altered documentation

Financial transparency is a core compliance requirement.

13. Reporting Mechanisms & Whistleblower Protection

Employees and external stakeholders may report suspected bribery or corruption through designated reporting channels. AAIP/HR64 ensures:

- Confidentiality of whistleblowers
- Protection from retaliation or discrimination
- Fair and prompt investigation of all complaints

Good-faith reporting is encouraged and safeguarded.

14. Investigation & Disciplinary Actions

All reported cases will be investigated objectively by the Compliance/HR/HSE teams as applicable. Confirmed violations may lead to:

- Written warnings
- Suspension
- Termination of employment
- Legal action under applicable laws



- Contractor or vendor blacklisting
Severe offences may be escalated to law enforcement authorities.

15. Training & Awareness

AAIPL will conduct periodic training for employees, supervisors, procurement teams, and contractors on:

- Identifying bribery risks
- Ethical decision-making
- Reporting procedures
- Legal and compliance obligations

Training records will be maintained as part of audit compliance.

16. Responsibilities

Management:

- Promote ethical culture, allocate resources, and enforce compliance.

Compliance/HR/Finance Departments:

- Oversee reporting, investigations, audits, and record keeping.

Supervisors:

- Monitor team behaviour and enforce standards.

Employees & Contractors:

- Uphold ethical behaviour and report suspected violations.

Vendors:

- Comply with anti-corruption obligations and contractual requirements.

17. Policy Review

This policy will be reviewed annually or earlier based on regulatory changes, audit findings, industry best practices, or incident learnings.

Reviewed By
S.Kowsalya
AGM-HR

Approved By
D.Prabhu
Managing Director