



# **FIEM INDUSTRIES LIMITED**

## **Anti-Bribery & Anti-Corruption Policy** **(ABAC Policy)**

## 1. Introduction & Objective

**Fiem Industries Limited (Company)** is committed to conduct all its business affairs in an honest, fair and ethical manner. Hence, Company has adopted a 'zero-tolerance' approach to bribery and corruption matters and is committed to acting professionally, fairly and with integrity in all its business dealings.

Company is committed to uphold all laws applicable on it, preventing bribery and corruption across its operations and areas where it operate.

In India, under the provisions of Prevention of Corruption Act, 1988 (PCA), acceptance or attempted acceptance of any form of illegal gratification (i.e., anything of value other than a legal entitlement) by a public servant is a punishable offence. Companies Act, 2013 also has provisions to prevent corruption in corporate sector.

In addition to the Prevention of Corruption Act, 1988, the Indian Penal Code, 1860 ("IPC"), Prevention of Money Laundering, 2002, Central Vigilance Commission Act, 2003, Lok Ayukta Acts of various states shall also apply to offences relating to or resulting in corruption and bribery offences.

The objective of the Policy is to safeguard and promote legitimate and fair business throughout the Company and to prevent and prohibit corruption, bribery and similar acts in connection with the organization.

**Anti-Bribery and Anti-Corruption Policy (Policy)** re-affirms the commitment of the Company to ensure integrity and fairness in all business dealings of the Company.

This Policy mandates all Employee (including employees of subsidiaries and Board Members) of the Company and its business associates to adhere to all applicable laws governing the offences relating to corruption and bribery.

Bribery and corruption are punishable for individuals and organizations as per the laws of various countries. The Company recognizes that laws and industry practices may vary from country to country. However, all Employees and associates are mandated to adhere to the guidelines set out in this Policy.

## 2. Applicability and Scope

This Policy applies to **Fiem Industries Limited and its subsidiaries**, across all locations.

This Policy shall cover all Employees of the Company and its subsidiaries and consultants as retainer, workers engaged by contractors etc. (associated persons).

This Policy should be read in conjunction with following policy documents of the Company:

- **FIEM Code of Conduct**
- **Whistle Blower Policy / Vigil Mechanism**

Company will communicate the Policy to its Employees and will publish on its website. Every employee is bound to comply with this Policy.

### 3. Definitions

**3.1 Third party**” means any individual or organization dealing with the Company during the course of its normal business dealings, and includes existing and potential customers, suppliers, service providers, contractors, agents, advisers, and government and public bodies.

**3.2 ‘Bribery’:**

- Bribery refers to the act of offering, giving, promising, asking, accepting or soliciting something of value or of an advantage so to induce or influence an action or business decision.
- A bribe refers to any inducement, reward, or object/item of value offered, promised or provided to another individual or firm or organization in order to gain commercial, contractual, regulatory, or personal advantage.
- Bribery can be offering or giving a bribe or receiving or accepting a bribe. In both cases, the act of bribery happened

### 4. Policy Statement

Bribery is illegal in all its forms. Employees must not engage in any form of bribery, be it directly, passively, or through a third party (such as an agent or distributor). They must not bribe a public official, including a foreign public official anywhere in the world. They must not accept bribe in any form, whatsoever.

### 5. Policy Principles Elaborated

#### **5.1 Extending Hospitality and Gifts- allowed if in normal course of business**

Hospitality in the ordinary course of business is a part of normal business affairs, which is accepted by the Company. However, hospitality or other business expenditure can be treated as bribery, if there is a quid pro quo arrangement or paid as a facilitation fee to extract any undue benefit for the person or for the Company.

Giving or receipt of gifts, or extending or availing hospitality is not prohibited, if they comply the guidelines of the Company and part of its normal business dealing. Further, it should be appropriate in type and value in the given circumstances. Like gifts on occasions of festivals like Christmas, Diwali etc. are okay Further, gifts as mark and token of respect and honor after meetings / visits with business associates, customers, strategic partners or potential business partners are also acceptable.

#### **5.2 Accepting Gifts and Entertainment by Employees – prohibited**

In general, Employees shall not accept gifts or the thing of anything of value (including entertainment) from current or prospective Suppliers, Service Provides, Contractors of the Company, or any other entity or individual, directly or indirectly related and having a conflict of interest with the Company / Employee.

Employees may never accept a gift under circumstances in which it could even appear to others that the business judgment may be compromised. Similarly, employees may not accept or allow a close family member to accept gifts, services, loans or

preferential treatment from Suppliers, Service Provides, and Contractors etc.

Cash gifts or their equivalent (e.g., gift cards or vouchers) shall not be accepted under any circumstances. Non-cash gifts may be accepted on customary occasions if they are (1) nominal in value (e.g. diaries, planners and similar stationery, inexpensive food items or sweets; (3) appropriate, customary and reasonable gifts based on family or personal relationships, and clearly not meant to influence Company's business.

If employees have any questions about the appropriateness of accepting a gift, invitation, raffle or other prize, employee should disclose and discuss the matter with Unit HR Head prior to participation or acceptance.

### **5.3 Facilitation Payments and Kickbacks – prohibited**

Company prohibits to make "facilitation payments" or "kickbacks" of any kind. Company recognize that facilitation payments are a form of bribery, and such facilitation payments are typically unofficial payments made to secure or expedite a routine government action by a government official or an any other official of authority.

Kickbacks are typically payments made in return for a business favor or advantage. Company do not allow kickbacks to be made or accepted.

### **5.4 Expectation from Business Relationships / Third Parties**

Company expects all Third Parties doing business with Company to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy and law of the land. The Company expects all Third Parties to cooperate and ensure compliance with these standards.

## **6. How and when to Raise a Concern**

In the event of any doubt on the integrity of a Third Party or anyone having reasonable information/doubt on the propriety of any business transaction that has happened already or may happen in the near future, Employees are encouraged to raise a concern about the same at the earliest possible stage, by availing the mechanism provided under Whistle Blower Policy / Vigil Mechanism. Employees need to familiarize themselves to the mechanism provided under Whistle Blower Policy of the Company to report any actual or suspected incidence under this Policy.

## **7. Protection of Complainant**

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another person's wrongdoing, are sometimes worried about possible repercussions. We encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. However, Employees also to make sure that the complaints are not with mala fide intent to victimize someone or to settle personal or professional scores.

## **8. Breach of Policy - consequences**

Any Employee / Third party who breaches this Policy, will face disciplinary action, including termination of employment or business / contractual relationship and may be subject to applicable legal action by the appropriate enforcement agencies.

## **9. Training & Awareness**

The primary responsibility of understanding the Policy, attending trainings and orientation programs, and seeking clarifications in case of doubt, lies with the Employees and the business partners.

The HR Department undertake training and orientation to all Employees to help them understand their duties and responsibilities under this Policy.

The Company's zero tolerance approach to bribery to also communicate to all Suppliers, Service Provides, Contractors and all other Third parties coming into contact with the Company for business dealings.

## **10. Review**

This Policy may be periodically reviewed and updated, if there are significant changes in the applicable regulations.