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1. PURPOSE - The purpose of this policy is to establish a zero-tolerance framework against bribery and corruption and to ensure that all business activities of Telema Electricals Private Limited are conducted in an honest, ethical, and lawful manner.

This policy ensures prevention, detection, reporting, and control of bribery, corruption, facilitation payments, kickbacks, and any improper advantage and protects the company from legal penalties, financial loss, and reputational damage.

2. SCOPE - This policy applies to all employees, directors, trainees, contractors, consultants, agents, suppliers, and any individual acting on behalf of Telema Electricals Private Limited.

This policy applies to all interactions with third parties including customers, suppliers, distributors, advisors, and government or public officials.

3. DEFINITIONS - For the purpose of this policy, the following definitions shall apply:

- 3.1 Bribery means offering, promising, giving, requesting, or accepting anything of value to influence a decision or gain an improper advantage.
- 3.2 Kickback means return of a portion of a payment or contract value as a reward for facilitating a transaction.
- 3.3 Facilitation payment means an unofficial payment made to expedite routine actions.
- 3.4 Extortion means demanding or accepting a benefit through coercion or pressure.
- 3.5 Third party means any individual or organization interacting with the company including suppliers, customers, agents, consultants, and public authorities.
- 3.6 Improper advantage means any benefit obtained through unethical or unlawful means.

4. OVERALL RESPONSIBILITY

- 4.1 The Director shall ensure enforcement of this policy and review serious violations.
- 4.2 The HR Department shall receive and record concerns, coordinate investigation, and maintain records.
- 4.3 The Accounts Department shall ensure financial transparency, proper documentation, and control over payments.
- 4.4 Department Heads shall ensure compliance within their areas and prevent unethical practices.
- 4.5 All employees and associated persons shall comply with this policy and report any violation.


5. ABBREVIATIONS

- HR - Human Resources

6. ACTIVITY DESCRIPTION

- 6.1 The company shall conduct all business activities in an honest, ethical, and transparent manner and shall maintain zero tolerance towards bribery and corruption.
- 6.2 No employee or representative shall offer, promise, give, request, or accept any bribe, facilitation payment, kickback, or improper benefit in relation to company business.
- 6.3 No employee shall offer or accept gifts, hospitality, or any benefit that may influence or appear to influence a business decision and any such offer shall be refused and reported on the same working day.
- 6.4 No payment shall be made to any third party or government official to obtain or expedite approvals, licenses, or business advantage through improper means.
- 6.5 Employees shall not engage in extortion or accept any benefit under pressure or coercion.
- 6.6 All employees shall avoid any activity that may lead to or suggest a violation of this policy.

PREPARED BY	REVIEWED & APPROVED BY
Management Representative	Plant Head

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- 6.7 All payments shall be supported by valid documentation and shall be proportionate to the goods or services provided and a proper receipt shall be obtained for each payment.
- 6.8 All financial transactions shall be recorded accurately in company records and no false, misleading, or off-record entries shall be made.
- 6.9 All expenses including gifts, hospitality, and payments to third parties shall be recorded with clear business justification.
- 6.10 Employees shall evaluate all payments and transactions before execution and shall report any suspicious or disproportionate request before proceeding.
- 6.11 All third parties shall be informed about the company's anti-bribery requirements and shall be expected to comply with them.
- 6.12 Employees shall report any request for bribery, suspicion of corruption, or violation on the same working day and such report shall be recorded in the Incident, Investigation, Action & Closure Record (TEPL/EV/F/01).
- 6.13 The HR Department shall acknowledge the concern within 1 working day and initiate review.
- 6.14 The HR Department shall investigate the matter within 5 working days including verification of financial records, transaction review, and collection of statements.
- 6.15 The HR Department shall ensure protection of the reporting individual and no retaliation shall be permitted under any condition.
- 6.16 Where violation is confirmed, appropriate action shall be taken which may include disciplinary action, termination, financial recovery, or termination of third-party contract depending on severity.
- 6.17 All confirmed violations shall also be recorded in the Incident, Investigation, Action & Closure Record (TEPL/EV/F/01) and processed as per Disciplinary Policy.
- 6.18 The HR Department shall communicate the outcome within 2 working days of completion of investigation.
- 6.19 Any false reporting or misleading information shall be treated as misconduct and shall result in disciplinary action.
- 6.20 The company shall conduct risk assessment related to bribery and corruption at least once every 12 months and records shall be maintained.
- 6.21 Managers shall implement controls within their areas to prevent and detect bribery and shall ensure that employees are aware of this policy.
- 6.22 The HR Department shall review all reported cases and controls at least once every 30 days.
- 6.23 Once in every 12 months, an internal assessment shall be carried for the effective implementation of anti-corruption practices and records shall be maintained in the Anti-Corruption Checklists (TEPL/EV/F/03).
- 6.24 Risks related to the corruption shall be determined and required controls shall be applied for the key risks. Details shall risk assessment shall be documented in the Corruption Risk Assessment Report (TEPL/EV/F/04).
- 6.25 Training on anti-bribery and anti-corruption shall be conducted at the time of joining and refresher training shall be conducted at least once every 12 months.
- 6.26 This policy shall be communicated to all employees, contractors, and business partners and awareness shall be ensured.
- 6.27 No exception to this policy shall be allowed under any condition.

7. DOCUMENTED INFORMATION

- 7.1 Incident, Investigation, Action & Closure Record (TEPL/EV/F/01)
- 7.2 Anti-Corruption Checklists (TEPL/EV/F/03)
- 7.3 Corruption Risk Assessment Report (TEPL/EV/F/04)

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8. KPI (KEY PERFORMANCE INDICATORS)

8.1 Quantitative KPIs

- Investigation within 5 working days - Target: 100%
- Case closure within 10 working days - Target: 100%
- Annual risk assessment - Target: 100%

8.2 Qualitative KPIs

- Zero tolerance culture
- Transparent financial practices
- Strong third-party compliance
- No retaliation cases

9. REVISION HISTORY

Version	Date	Description of Change	Prepared By	Approved By
1.0	01.01.25	Initial Release	HR	Director

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Management Representative	Plant Head