



**RAMKY INFRASTRUCTURE LIMITED**  
**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY (ABAC)**



## **Policy Statement:**

Ramky Infrastructure Limited (RIL) practices Zero Tolerance approach towards Bribery and Corruption and is committed to act professionally and fairly in all its business dealings and relationships and in implementing and enforcing effective systems to counter bribery and corruption in any form.

The basic tenets of anti-bribery and anti-corruption stems from the Prevention of Corruption Act 1988 and thereafter amended in 2018 by way of Prevention of Corruption (Amendment) Act 2018 coupled with the code of conduct and Prevention of Insider trading Policy of the Company.

This Anti-Bribery and Anti-Corruption Policy has been formulated and designed to provide a framework for ensuring compliance of the various legislations governing bribery and corruption and prescribe a standard of behavior which has to be adhered to.

Ramky Infrastructure Limited is committed to act with integrity to ensure that we are trusted by our customers, colleagues, business partners, local communities in which we operate. As part of this commitment any form of bribery and corruption is not acceptable.

## **Purpose:**

The Purpose of this Policy is to:

- 1) Set our responsibilities and of anyone working with and for us in upholding our position on bribery and corruption in Government and Non-Government Dealings.
- 2) Provide guidance and information to those working with us including but not limited to our entire supply chain and any third party on how to recognize and deal with bribery and corruption.

## **Scope:**

This Policy applies to all employees of Ramky Group and third parties whom the group deals with.

- 1) **Employee:** Includes directors, officers, employees engaged directly or indirectly where ever located regardless of their grade, position in terms of all dealings and transactions in which the company operates.
- 2) **Third Party:** Includes any Individual or organization who has business dealings with the company and includes actual and potential business associates, customers, contractors, sub-contractors, business partners, suppliers, distributors, business contacts technical and other



agents and government bodies and officials or any other person associated and acting on behalf of the company.

### **Bribery and Corruption:**

**Bribery** is anything of value, including money, gifts and entertainment other business courtesies, hospitality or personal gratification given, offered or received in an attempt to influence a person's behavior in order to obtain or retain business or secure unfair benefit.

**Corruption** is dishonest behavior by those in power such as managers or government officials. Corruption includes giving or accepting bribes, inappropriate gifts, under the table payments or benefits, diverting funds, laundering money.

### **Forms of Bribery:**

- 1) **Gifts and Hospitality:** Employees shall ensure that hospitality and gifts shall not be in such a way as would have an impact on free will and decision making ability of the individual or making him unduly obligated in any manner.
- 2) **Political Contributions:** The Company upholds its commitment to not support any specific political party or any political affiliation. No political contribution shall be made except with the approval of the board of directors.
- 3) **Charitable Contribution:** The Company shall ensure that charitable contribution shall not be used as a vehicle to further the business purpose of the company.
- 4) **Facilitation Payments and Kickbacks:** Facilitation Payment are small payments made to government officials to facilitate or expedite the performance of routine, non-discretionary government actions that a government official is already obliged to perform such as issuing of license, permits etc. Facilitation payments do not include any payment done to make the govt. official take decision or awarding of new business to the organization.  
Kickback is a form of negotiated bribery in which two parties to the transaction negotiate the bribe to be settled between them as part of furthering the purpose of other party in an illegal scheme.

RIL Strictly prohibits payment of Facilitation payment and/or kickbacks either directly or through any of its subsidiaries, intermediaries, Joint ventures, Consortiums, Contractors, Sub-Contractors or suppliers.

### **Responsibility of Employees:**

All employees must read this policy and at all times comply at all times with the Requirements.



The responsibility of identifying and reporting bribery and other forms of corruption is the responsibility of employees working for the company. All employees are required to prohibit themselves from undertaking any bribery or corruption.

Employee if proven in violation of this policy shall be subject to disciplinary action including dismissal from services.

Any third party found in violation of this policy shall be liable to contractual termination and other terms as specified in the contracts.

### **Whistle Blowing:**

RIL shall ensure that the employees who refuse to accept/give bribes or those who raise concern about another's wrong doing shall not be subject to any discrimination or any possible repercussions which can be associated with such stand stated above.

The Company is committed to ensuring that no one suffers any detrimental treatment as a result of not participating in any bribery or corruption.

The Employees can approach the Concerned Human Resource Team of the Company to lodge their suspicion to such deferential treatment.

### **Training and Communication:**

As part of prevention and identification and detection of anti-bribery and anti-corruption issues, training and risk assessments shall be conducted throughout the organization.

As part of the SOP proper training of the ABAC policy shall be made part of the induction program in of the new recruits.

All existing employees at all levels shall be communicated about the policy.

### **Implementation Authority:**

The board of directors shall be prima facie responsible for the overall implementation and review of its implementation at different periods of time.

The Human Resource Department shall be the implementation authority at organization level and are responsible for implementation, training and dealing with any queries on implementation.

All employees are required to give annual disclosure on financial year basis confirming their compliance with the policy as specified periodically.



### **Monitoring and Review:**

The Human Resource department shall assess the effectiveness of the policy and ensure that the policy parameters suits the current operational exposure of the employees and recommend the required change is any in the policy to the board based on their assessment and difficulties faced.