



YASH HIGH VOLTAGE LIMITED

Company CIN NO.

U40109GJ2002PLC040833

ANTI-BRIBERY &

ANTI-

CORRUPTION

POLICY

(Effective from 29-06-2024)

Anti Bribery-Anti Corruption Policy

1. Objective

Yash Highvoltage Limited (YASH)'s commitment is to conduct the business in compliant environment with honesty, integrity and in conformity with the highest possible ethical standards to ensure monitoring, prevention and detection of fraud, bribery and all other corrupt business practices. We take a zero-tolerance approach to bribery and corruption and are committed to act professionally, fairly and with integrity in all our relationships and business dealings wherever we operate. We strive to implement and enforce effective systems to counter bribery and promote "Zero Dishonesty".

The objective of this policy is to spread awareness about the possible misconducts related to bribery and corruption amongst "YASH" employees and set responsibility of all the employees, vendors and partners' etc. to vigilantly observe and uphold the position against bribery & corruption and to ensure compliance with regulatory requirements with respect to Anti-Bribery and Anti-Corruption laws.

2. To whom this policy is applicable?

- 2.1 This Anti-bribery and Anti-corruption Policy (this "Policy") applies to all individuals working for "YASH" at all levels and grades, including directors, Managers, officers, employees (whether permanent, fixed-term or temporary), trainees, seconded staff, casual workers, volunteers, interns, agents, or any other person associated with "YASH" (collectively referred to as "You" or "you" in this Policy).

3. What is bribe & Corruption?

- 3.1 A bribe is an act of offering, giving, receiving, or soliciting inducement, payment, reward or advantage offered, promised or provided to recompense to a recipient in exchange for an alteration of their behavior (to the benefit/interest of the giver) that the recipient would otherwise not alter and gain any commercial, contractual, regulatory or personal advantage.
- 3.2 A bribe may be anything of value and not just in form of money gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, payment or reimbursement of personal expenses, charitable donation or social contribution, abuse of function – given directly or thru an agent or representative.
- 3.3 Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards.

4. Laws and regulations prohibiting bribery and corruption?

It is illegal to directly or indirectly offer or receive bribe. It is also a separate offence to bribe a government/ public official. Indicative Laws & regulations relating to bribery and corruption as applicable to commercial organizations including companies and residents of India mentioned as below:-

- 4.1 Prevention of Corruption Act, 1988
4.2 Lokpal and Lokayuktas Act – 2013
4.3 Companies Act – 2013
4.4 Black Money Act – 2015
4.5 Indian Penal Code – 1860
4.6 Whistle Blowers Protection Act – 2011
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5. What else could be covered under bribery and corruption?

Below are the suggestive instances which will be considered as an act of bribery or corruption:-

- 5.1 Employee of "YASH" entering, directly or indirectly into any business transaction with "YASH"
- 5.2 In order to obtain or provide undue benefit/ undue advantage on behalf of an employee his/ her representative or relative provides, solicits or accepts cash or its equivalent, entertainment, favors, gifts etc. to or from present/ prospective competitors, vendors, suppliers, customers or others.
- 5.3 Non-Disclosure of Conflict of Interest as per policy of "YASH".
- 5.4 Claiming/supporting/arranging undue benefits/ undue advantage/ reimbursement from "YASH".
- 5.5 Loans from any persons or companies having or seeking business with "YASH", except recognized financial institutions.
- 5.6 Loans in any form taken from a subordinate in "YASH".

6. Gifting Conventions of "YASH":

The basic rule is that we do not accept gifts from "YASH" partners, suppliers and vendors. It is a good habit to politely decline gifts simply citing our company policy.

In a situation where it is impolite to refuse out rightly being in a public forum/packed condition/gift left at reception in the absence of employee presence in office, one may accept the same if they are small promotional items of their company, preferably bearing their logo with an approximate value of not more than Rs. 1000. This applies during festivals and occasions like Diwali. Gifts on personal occasions such as birthdays, anniversaries, etc. are absolutely not acceptable. Examples of acceptable gifts: Corporate calendar, mugs, books, sweets, bouquet of flowers.

Gifting to customers is allowed up to limits prescribed in DOA subject to necessary approvals. The purpose of gifting and details of recipient, needs to be adequately documented. The intention of gifting must not be to provide/gain undue benefit, but to honor social custom.

7. Do's

Every employee, consultant, associate, partner or any other person entering into a contractual relationship on behalf of "YASH" must:-

- 7.1 Conduct reasonable due diligence to review the integrity of the Third Party before entering a commercial relationship and must present the true facts and information known and collected by him to the approving authority.
- 7.2 Must obtain necessary approvals and shall completely follow the documentation process for engagement and selection of any Third Party.
- 7.3 Communicate each Third Party within your work area about "YASH"'s mandate of ethical business operations.
- 7.4 Ensure fees and commissions agreed will be appropriate and justifiable remuneration for legitimate services rendered.
- 7.5 If you receive an offer of bribe or to be a part of a corrupt act, immediately report the matter through reporting channel.

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- 7.6 In the event of any doubt on the integrity of a Third Party, it is your responsibility to contact your Manager, Division head or SIA. The matter can also be reported via the whistle blowing portal through reporting channel.
- 7.7 All relationships with those whom “YASH” deals with should be cordial, but must be on an arm’s length basis.

8. Don’ts

It is prohibited for “You” (or someone on “your” behalf) to: -

- 8.1 Accept an offer of a gift of any size from any “Third Party” which is in negotiation with, or is submitting a proposal with “YASH”.
- 8.2 Give, promise to give or offer, any payment, gift, hospitality or advantage to obtain or retain business.
- 8.3 Any payments/ undue advantage made to or received from a commercial organization in return for a business favor/ advantage, such as a payment made/ received to secure the award of a contract.
- 8.4 Any unofficial payment/ undue advantage made to secure/ retain business or expedite a routine government action by a government official which otherwise would not result the same as after making the unofficial payment.
- 8.5 Any unofficial payment/ undue advantage or equivalent received by an employee from his subordinate, dealer, partner, consultant, associate or any other person in contractual relationship with “YASH”.
- 8.6 Any illegal payment/ undue advantage made to a company, agency, media house or alike entity to hide or expose, suppress or reveal, exaggerate or compress any issue, information or fact in order to gain business/ personal advantage.
- 8.7 Any Charitable donation/ undue advantage made to any political party, trust, institution, organization or alike entity in order to obtain/ retain business.
- 8.8 Threaten or retaliate against any employee, partner or vendor who has refused to commit a bribery offence or who has raised concerns under this policy.
- 8.9 Any other willful act with corrupt intent to defeat, by pass the provisions of this policy or other regulations or to enter into any arrangement which lead to breach of this policy or breach the intention of this policy actually or morally.

9. Record-keeping

- 9.1 All accounts, books, invoices and other documents & records must be maintained in reasonable detail which accurately and fairly reflect the transactions and dispositions of the assets of the company.
- 9.2 No accounting entry, expense, provisions will be kept “off the books” in order to facilitate or conceal improper payments or arrangements.

10. How to report a concern?

Every employee who has a concern relating to any issue or suspicion of any non-compliance, malpractice or any other illegitimate arrangement must report the issue as provided under Clause 12 of the Vigil Mechanism Policy available on the site of the Company.

11. Whistle Blower Protection

A whistleblower would be given the option to keep his/ her identity anonymous while reporting an incident on Ethics Helpline. The company will make no attempt to discover the identity of an anonymous whistleblower. If the whistleblower's identity becomes known during the course of the investigation, company will ensure that the identity of the whistleblower will be kept anonymous and confidential to the extent possible, unless required by law or in legal proceedings.

Protection under this mechanism would not mean protection from disciplinary action arising out of false allegations made by a whistleblower.

(For further details on reporting and whistle blower protection please read the vigil mechanism available on the website of the "YASH")

12. Violations and Penalties

In addition to the individual penalties including statutory penalties provided under any law for the time being in force, any employee who breaches this Policy will be subject to disciplinary action, which could result in termination of the employee's services or any other action as deemed fit by the disciplinary committee.