

## Anti-Bribery Policy

### 1) **Introduction:**

Adherence to good Corporate Governance and managing its affairs in a fair, honest, ethical and transparent manner is an integral part of the corporate philosophy of Bimetal Bearings Ltd.

Furtherance to its philosophy the Company has formulated this Anti-Bribery Policy to ensure that no employee of the Company indulges in and associates with any act of bribery, extortion or corruption with any government officials or any person for or on behalf of the Company. This Anti-Bribery Policy is framed based on 'The Prevention of Corruption Act, 1988' and other similar applicable Anti-Bribery and anti-corruption Laws of India and the World.

The Certified Standing Orders of the company also specifies that taking and giving Bribe or any illegal Gratification by any employee of the company is a serious Misconduct, for which severe disciplinary action including termination of service can be taken against him.

### 2) **Applicability and Purpose:**

This Anti-Bribery Policy will come to force from 1<sup>st</sup> January 2018.

This policy will apply to all Senior executives, Managers, Staff, Unionised workers, the contract and out-sourced workers of the company including subcontractors, Vendors, Service providers, Suppliers, Customers, Agents & Representatives of any company, and anyone else doing business with the Company. The Company has a zero tolerance approach to acts of Bribery and Corrupt practices indulged by employees or other stake holders of the company or anyone acting on behalf of the Company. Any breach of this policy or our Company's Standing orders will be regarded as a serious misconduct by the Company for which appropriate action will be initiated.

### 3) **Policy:**

This Policy reflects the business practices and principles of behavior that support this commitment to zero tolerance approach to acts of Bribery and corruption and receiving any illegal gratification.

#### **(i) General Principles:**

No bribes or Gifts or any Illegal Gratifications of any sort shall be paid or accepted from the employees, customers, suppliers, contractors, politicians,

government / public official, public advisors or representative's private person or Company for or on behalf of the Company for or in respect of any business or official matters or transactions of the Company. Bribery is committed when an inducement or reward is provided, in order to gain any pecuniary, commercial, contractual, regulatory or personal advantage for the Company or another party.

**(ii) Business Meals and Gifts:**

All of the following conditions should be satisfied when offering business meals or gifts to Public Officials:

- a. Business meals or gifts offered to Public Officials should be within the range of normal social courtesies.
- b. There must be no circumstances that could give rise to any misunderstanding that such meal or gift is being offered with the intention of gaining any improper business advantage.
- c. Offering a meal or a gift should not violate the Anti-bribery Laws of the country which the Public Official works for.
- d. The expense of the meal and/or gift should be accurately and properly recorded in the appropriate accounting books.
- e. This policy does not prohibit the practices of providing any customary gifts in a particular market, provided such gifts are appropriate and of reasonable nature in comparison to the general market practice and are properly recorded. Please refer to our code of conduct policy for further information.

**(4) Prohibited Activities:**

- a. The Company employees should not offer and/or provide any pecuniary or other benefits to Public Officials either directly or indirectly (i.e. through a third party). Furthermore, if there is a possibility that any Business Entertainment could give rise to a misunderstanding that the Company has conducted the Business Entertainment with the intention of gaining an improper business advantage (irrespective of its genuine intention), the Company Staff should not offer the Business Entertainment in such situation.
- b. Offering any cash (including, but not limited to, bills/notes, Cheques, every kind of cash voucher, stock certificates and securities),
- c. Any entertainment at Hotels or similar adult entertainment clubs and

