



COMPANY ANTI CORRUPTION POLICY

1. Statement

We, CONVMECH ...The Heavy Engineering company (hereinafter referred to as "CONVMECH" or "the Company") are committed to conduct all of our business in an honest and professional manner with the highest possible ethical standards and vigorously enforce our fair and honest business practices. CONVMECH believes in a zero-tolerance approach towards bribery, corrupt and unethical activities. We are also committed to act professionally, fairly and with integrity in all our business dealings and relationships in all areas of our business.

CONVMECH's long standing commitment is to adhere constantly to all laws relating to countering bribery and corruption in all the jurisdictions in which we operate in addition to our own "Anti Corruption Policy". We remain bound by local, national and other applicable laws at domestic and international.

2. Scope and Applicability

This policy applies to all officers, employees, associates, vendors, agents etc. of the Company, including third parties. In the context of this policy, the relevant third parties refer to any contractor, supplier, vendor, advisor, actual and potential clients, customers, suppliers, business contacts, individuals or organizations with whom the Company deals in connection with the business of the Company or otherwise. It also refers to agents, advisors, joint ventures, private, government and public sectors, representatives and officials thereof to the extent permitted in law.

3. Covered under Corruption policy

Corrupt is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe. It also includes an act of offering, giving, promising, asking, receiving, accepting, or soliciting something of value and not just money or of an advantage so as to include or influence an action or decision.

Corrupt also includes any reward or object/item of value offered or incurred to or for another individual in order to gain commercial, contractual, regulatory or personal advantage. It also includes any kind of action, arrangement, and practice which is illegal or unethical or corrupt.

Bribe also includes any term defined in any provision of law or in any statute of local, state and central authorities against bribery and corruption. It is not limited to the act of offering a bribe. If an individual to whom provisions of this policy applies is found on offering/receiving end of the bribe, he/she shall be guilty of breach of this policy apart from breach of statutory provisions.

4. Gifts & Hospitality

This policy also prohibits offering/receiving any type of gifts, hospitality and consideration from/to any individual, corporate or a third party who somehow deals commercially with the Company so long as the giving/receiving of gift meets the following requirement:-

It is not made with the intention of influencing the party/person to whom it is being given, to obtain any reward or the retention of a business advantage or as an explicit or implicit exchange of favours or benefits in any form.

It is given in the name of the company, not in an individual name. It is not in the form of cash/cash voucher.

It is small in value and related to auspicious or special occasion and given/received openly.

An employee or member of his/her immediate family should not provide, solicit or accept gifts, favors, cash, kind, or any kind of benefit in any form from competitors, vendors, suppliers, customers or others that do business or intend to do business with CONVMECH. It is expected from every employee and his/her family members not to have any involvement, that could impair, or give the appearance of impairing, an employee's ability to perform his/her duties or to exercise business judgment in a fair and unbiased manner.

5. Employee Responsibilities

Each and Every employee, officer, agent, associate and/or advisor those are related to CONVMECH shall be responsible for the prevention of any activity that could lead to, or imply, a breach of this Anti Corruption Policy of the Company and shall make all reasonable efforts to avoid any kind of practice that may result in bribery, corruption and/or unethical practice under this policy or in applicable rules/laws.

If any employee, officer, agent, associate breaches this policy, he/she will face disciplinary action and could face dismissal from service apart from facing consequences for violation of related laws.

If an employee willfully ignores or turns a blind eye to any evidence of corruption or bribery within his/her department and/or around him/her, it will also be held against the employee, even though such conduct may be "passive" i.e. the employee may not have directly participated in that act.

Smt. S.Y. Gosai

Head – Group HR & Admin