

# ANTI-BRIBERY & ANTI-CORRUPTION POLICY

FLAMMER'S GUIDEBOOK TO ZERO DISHONESTY



# FLAMMER



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FLAMMER TECHNOLOGIES PRIVATE LIMITED



## 1 Objective

**Flammer'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 **Flammer** 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 Scope & Applicability

This Anti-bribery and Anti-corruption Policy applies to all individuals working for **FlammerTechnologies Private Limited** at all levels and grades, including directors, Managers, officers, employees, interns, agents, or any other person associated with "FTPL".

## 3 Definitions

### 3.1 Bribery

Bribery includes the offer, promise, giving, demand or acceptance of an undue advantage as an inducement for an action which is illegal, unethical or a breach of trust. Bribes often involve payments (or promises of payments) but may also include anything of value - providing lavish/inappropriate gifts, hospitality and entertainment, inside information, or sexual or other favours; offering employment to a relative; underwriting travel expenses; abuse of function; or other significant favours. Bribery includes advantages provided directly, as well as indirectly through an intermediary. This ABAC Policy prohibits Designated Persons from giving bribes not only to any public/government official but also to any private individual. Bribery in any form will not be tolerated.

### 3.2 Corruption

Corruption includes wrongdoing on the part of an authority, a commercial organisation (any person associated with such commercial organisation) 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:-





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- 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
- 4.7 **Flammer's Code of Conduct.**

## 5 Gifting Conventions

The basic rule is that we do not accept gifts from business partners, suppliers and vendors. It is a good habit to politely decline gifts simply citing our company policy. Gifts, entertainment, and hospitality may be acceptable if they are reasonable, proportionate, made in good faith and in compliance with company's policy.

Note that this ABAC Policy is applicable whether a Designated Person is personally offered a gift, or if a gift is offered for the benefit of a specific group or department at the Company. Gifts of cash or cash equivalents must never be accepted.

## 6 Facilitation Payments or Kickbacks

All Facilitation Payments and kickbacks are corrupt payments, and any such payment in the course of our Company's business is strictly forbidden.

Facilitation Payments are often involved in obtaining non-discretionary permits, licenses or other official documents, expediting lawful customs clearances, obtaining the issuance of entry or exit visas, providing police protection, whether or not such actions are connected to the award of new business or the continuation of existing business.

## 7 Conflict of Interest

**Flammer's Code of Conduct Policy** provides detailed guidance on assessment of potential situations of conflict of interest. Any conflict of interest, even if it is perceived or potential, reported to the Company Ethics Counsellor or the Compliance Officer or Directors, must be in turn reported to the appropriate competent authority as defined and actioned as per the guidance provided in the **Flammer's Code of Conduct Policy**.

## 8 Do's

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



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- 8.1 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.
- 8.2 Must obtain necessary approvals and shall completely follow the documentation process for engagement and selection of any Third Party.
- 8.3 Communicate to each Third Party within your work area about **Flammer's** mandate of ethical business operations.
- 8.4 Ensure fees and commissions agreed will be appropriate and justifiable remuneration for legitimate services rendered.
- 8.5 If you receive an offer of bribe or to be a part of a corrupt act, immediately report the matter through reporting channel.
- 8.6 In the event of any doubt on the integrity of a Third Party, it is your responsibility to contact your Manager, Division head or Director. The matter can also be reported via the whistle blowing portal through reporting channel.
- 8.7 All relationships with those whom business deals with should be cordial, but must be done on an arm's length basis.

## 9 Don'ts

- 9.1 Accept an offer of a gift of any size from any "Third Party" which is in negotiation with, or is submitting a proposal with **Flammer**.
- 9.2 Give, promise to give or offer, any payment, gift, hospitality or advantage to obtain or retain business.
- 9.3 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.
- 9.4 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 **Flammer**.
- 9.5 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.
- 9.6 Any Charitable donation/ undue advantage made to any political party, trust, institution, organization or alike entity in order to obtain/ retain business.
- 9.7 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.
- 9.8 Any other will-full 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.





## 10 Record Keeping

- 10.1 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.
- 10.2 No accounting entry, expense, provisions will be kept "off the books" in order to facilitate or conceal improper payments or arrangements.

## 11 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.

## 12 Periodic Review & Evaluation

The Board of Directors will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. Our Company reserves the right to vary and/or amend the terms of this Policy from time to time.



# FLAMMER

Flammer Technologies Pvt. Ltd.

  
Director

s/d

Director

Flammer Technologies Pvt. Ltd.

  
Director