

**ANTI-BRIBERY POLICY**

Policy No. : OCCL/OP/20/1.0

Supersedes :--

Date of issue : 1-Apr-2020

Effective Date: 1-Apr-2020

INTRODUCTION	Company's policy is to conduct all of our business in an honest and ethical manner. There shall be a zero-tolerance approach to bribery and corruption. The company is committed to acting professionally, fairly and with integrity in all its dealings wherever we operate. We are also committed to implementing and enforcing effective systems to counter bribery.
APPLICABILITY	This policy applies to all individuals working at all levels and grades, including senior managers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, and any other person providing services to us.
DEFINITION OF BRIBE	A bribe is a financial or other advantage offered as given: <ul style="list-style-type: none">• to anyone to persuade them to or reward them for performing their duties improperly or;• to any public official with the intention of influencing the official in the performance of his duties.
GIFTS AND HOSPITALITY	This policy does not prohibit giving and receiving promotional gifts of low value and normal and appropriate hospitality. However, in certain circumstances gifts and hospitality may amount to bribery and all employees must comply strictly with OCCL rules as mentioned in gifting policy & business code of conduct policy w.r.t. gifts and hospitality. We shall not provided gifts or hospitality with the intention of persuading anyone to act improperly or to influence a public official in the performance of his duties.
FACILITATION PAYMENTS AND KICKBACKS	We shall not make, and shall not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. Kickbacks are typically payments made in return for a business favour or advantage. All employees must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.
DONATIONS	We shall not make any financial contributions to any political party with intent to get any any undue favour or advantage. Similarly, we will not make any charitable donations for the purpose of gaining any commercial & other unethical advantages.
RECORD KEEPING	<ol style="list-style-type: none">1. Financial records and appropriate internal controls shall be in place to evidence the business reason for making any payments to third parties.2. All expense claims relating to hospitality, gifts or expenses incurred to third parties must be submitted in accordance with our expenses policy in SAP and specifically records the reason for the expenditure.3. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, must be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.



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RAISING CONCERNS	Employees will be encouraged to raise concerns through confidential means (Eg. suggestion box, email, whistle blower policy etc) about any issue or suspicion of malpractice at the earliest possible stage. No employee will suffer any detriment as a result of raising genuine concerns about bribery, even if they turn out to be mistaken.
MONITORING	The effectiveness of this policy will be regularly reviewed by the top management. Internal control systems and procedures will be subject to audit under the internal audit process. All such issues reported & discussed in MRM for necessary action. Bribery issues, if any will also be reported in annual report

APPROVED BY

Anurag Jain
CFO