

Anti Bribery

A bribe is where money or anything of value (even token value) is offered or given to influence the making of a decision by a third party/persuade them to perform their job improperly, or as a reward for having done so.

It is also bribery to receive or ask for a bribe, not just to offer or give one. It also includes offering bribes and asking for bribes, regardless of whether the bribe is actually paid, and paying bribes via third parties.

It is also bribery under the Prevention of Corruption Act 1988 to directly or indirectly give, offer, agree to give or agree to offer, a loan, reward, advantage or benefit of any kind to a foreign public official (or any person for the benefit of a foreign public official) to induce the official to do/ not to do something in order to help the Company obtain/retain business or a business advantage.

In addition, doing any of the above so that the official uses his/her position to influence any acts or decisions of the government/body they work for is a bribe.

It should be understood that the Company's anti-bribery policy is not just limited to bribes paid to government officials and includes bribes paid to or from any third parties, including employees of private companies.

“Facilitation payments” are non-official payments made to government officials anywhere in the world which the official (usually low level) may ask for to speed up/perform routine governmental action (such as granting licenses, to overlook fines, providing police protection, provision of utilities etc.).

Typically, the amount requested is fairly low - e.g. Rs 5000, 10000 etc. These are not official fees. They are fees the official is pocketing for himself.

If an Employee is ever genuinely concerned for their immediate safety, they should make the payment and then immediately report it to the Legal Officer giving details of the amount paid, where and to whom and the reasons why they were concerned for their safety. There are no other circumstances in which facilitation payments should be made.

Employees should report any possible or actual breaches of this Code relating to bribery to the Legal Officer.