



**HGIEL**  
*We Make People Move...*

Version 1.0


# Anti-Corruption & Anti- Bribery Policy



Document Owner:


**ESG COUNCIL**

H. G. INFRA ENGINEERING LIMITED

 <b>HGIEL</b> <i>We Make People Move...</i>	<b>H. G. Infra Engineering Limited</b>		
	Document No.	Version No.	Date:
	HGIEL/ABC/1/22	V1.0	01.01.2023
	<b>Anti-Corruption &amp; Anti- Bribery Policy</b>		

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## 1. INTEGRITY PLEDGE

(In accordance to the circular No. 20/09/22 by Central Vigilance Commission)

The company believe that corruption has been one of the major obstacles to economic, political and social progress of our country.

The company believe that all stakeholders such as government, citizens and private sector need to work together to eradicate corruption.


HGIEL acknowledge it's responsibility to lead by example and the need to put in place safeguards, integrity, frameworks and code of ethics to ensure that the company is not part of any corrupt practice and we tackle instances of corruption with utmost strictness.

HGIEL realize that as an organization, it need to lead from the front in eradicating corruption and in maintaining highest standards of integrity, transparency and good governance in all aspects of it's operations.

The company, therefore pledge that:

- It shall promote ethical business practices and foster a culture of honesty and integrity;
- It shall not offer or accept bribes;
- It commit to good corporate governance based on transparency, accountability and fairness;
- It will adhere to relevant laws, rules and compliance mechanisms in the conduct of business;
- It will adopt a code of ethics for all our employees;
- It will sensitize our employees of laws, regulations, etc. relevant to their work for honest discharge of their duties;
- It will provide grievance redressal and whistle blower mechanism for reporting grievances and fraudulent activities;
- It will protect the rights and interests of stakeholders and society at large.

**ESG Council**  
Authorized Signatory  
H. G. Infra Engineering Limited

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## 2. INTRODUCTION

The company is committed to conduct business with integrity and in compliance with all applicable laws and regulations. It prohibits all forms of bribery and corruption, both direct and indirect, and expect it's employees, agents, contractors, suppliers, and anyone else who acts on behalf of it to uphold these standards.

## 3. DEFINITION OF BRIBERY AND CORRUPTION

Bribery is the offering, giving, receiving, or soliciting of any item of value, such as money, gifts, or favours, in order to influence or reward any person to gain an unfair advantage. Corruption refers to any abuse of entrusted power for private gain, including the misuse of public funds, the manipulation of contracts or procurement processes, and the provision of false or misleading information.

## 4. PROHIBITION OF BRIBERY AND CORRUPTION

HGIEL prohibits all forms of bribery and corruption, both direct and indirect. This includes, but is not limited to:

- Offering, giving, or accepting any bribe or other improper benefit, whether in cash or in kind.
- Making or receiving payments or gifts to or from government officials, political parties, or candidates for public office, or any other person, with the intention of influencing their decision-making or gaining an unfair advantage.
- Providing false or misleading information to any person, including auditors, regulators, or law enforcement agencies.
- Engaging in any other corrupt or unethical practices, such as kickbacks or embezzlement.

## 5. GIFTS, HOSPITALITY, AND EXPENSES


HGIEL recognize that it is common business practice to give or receive gifts, hospitality, or expenses. However, HGIEL require that all such actions be transparent and reasonable and must not create any perception of impropriety. The company expect its representatives to exercise good judgment and seek approval from their supervisor or compliance officer if they are unsure about the appropriateness of any gift, hospitality, or expense.

## 6. REPORTING AND INVESTIGATION

The company require all representatives to report any suspicion or evidence of bribery or corruption immediately to their supervisor or compliance officer. It will investigate all reports promptly and thoroughly and take appropriate remedial action if necessary.

## 7. CONSEQUENCES OF NON-COMPLIANCE

Any representative who violates this policy will be subject to disciplinary action, up to and including termination of employment or contract. In addition, HGIEL may report any suspected

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or actual bribery or corruption to relevant authorities and may cooperate fully with any investigation or prosecution.

## 8. TRAINING AND COMMUNICATION

The Company provides periodic training and communication to all representatives on this policy, including the risks and consequences of bribery and corruption, and how to identify and report any potential violations. It also communicates this policy to it's business partners, and require them to comply with its provisions.

## 9. REVIEW

HGIEL periodically review and update this policy to ensure that it remains relevant and effective, and to reflect any changes in laws or regulations. It also monitor it's compliance with this policy, and report any significant incidents or trends to its board of directors.

## 10. CONTACT INFORMATION

If you have any questions or concerns about this policy, please contact:

### CHAIR - ESG COUNCIL

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 Authorized Signatory  
 H. G. Infra Engineering Limited

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