



**WEBSOL ENERGY SYSTEM LIMITED**

**POLICY ON ANTI-BRIBERY**

**AND**

**ANTI-CORRUPTION POLICY**

## **Policy on Anti-Bribery and Anti-Corruption**

### **Purpose & Objective:**

Anti-Bribery and Anti-Corruption Policy of Websol Energy System Limited states that no designated persons shall give/ receive / facilitate bribes or other illegal gratification /gifts to another person or organization in order to unduly favor any person/party or to gain any unfair advantage or obtain /retain business.

### **Scope:**

The purpose of the policy is to safeguard and promote legitimate business throughout the organization and to prevent and prohibit corruption, bribery and similar acts in connection with the organization.

### **Key Principles and Definitions:**

A “bribe” is anything of value that is offered, promised, given, or received by any party to influence a decision or to gain or reward an improper or unfair advantage for the benefit of the Company. “Corruption” is the willingness to act dishonestly in return for money or other personal gains.

### **Gifts, Hospitality and Entertainment:**

Employees and Third Parties (acting on behalf of Websol) are prohibited to offer, give, receive or solicit any Gifts, Hospitality or Entertainment with an intent to induce or influence any act or decision in favour of the Company.

### **Third Parties:**

Third Parties acting on behalf of Websol are prohibited from engaging in any act that could be construed as Bribery whether acting directly or indirectly. Employees shall not authorize or permit and/ or encourage directly or indirectly any act or payment if they are either aware that the Third Party is engaging in improper conduct or have a reasonable suspicion that improper conduct of the Third Party may occur while dealing or in connection with Websol business. Employees engaging Third Parties shall ensure appropriate due diligence in consultation with Business Compliance Leads is completed before engaging them.

### **Interactions with Government Officials:**

All such interactions must adhere to the Company’s commitment to act in compliance with the highest ethical standards and to conduct business honestly and legally; Payments in cash or cash equivalents must not be offered or provided to government officials regardless of the purpose for such payment. The purpose and focus of any companies sponsored meetings, or event to which government officials are invited must be to inform the government officials well in advance. Travel and travel related hospitality when extended to government officials is subject to pre-approval requirements, The Companies will not pay travel and hospitality costs associated with any guests and/or relatives of government officials. Interactions with government officials should reflect well on the Companies and to avoid the appearance of impropriety.

### **Record Keeping:**

Employees must ensure all expenses claims relating to hospitality, gifts or expenses incurred to Third Parties are submitted in accordance with Company policies and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with Third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No

accounts will be kept “off-book” to facilitate or conceal improper payments and the same is ensured through effective monitoring and auditing mechanisms in place

#### **Hiring Practices:**

Prohibited from using job placements, future employment, or internships for the purpose of improperly influencing a business decision.

#### **Facilitation Payments and Kickbacks:**

Neither an employee of Websol nor any person acting on behalf of Websol shall make or accept directly or indirectly “facilitation payments” or “kickbacks” of any kind. “Facilitation Payments” are typically small made to secure or expedite a routine government action by a government official. “Kickbacks” are bribes to obtain an undue advantage, where a portion of the undue advantage is 'kicked backed' to the person who gave, or is supposed to give, the undue advantage. Employees report suspicions, concerns, queries and demands for Facilitation Payments to their reporting Manager refuse to make such payments.

#### **Periodic training:**

Regular training are carried out and communication are made to employees regarding the Anti-Corruption and Anti-bribery Policy and their role to ensure compliance.

#### **Disciplinary action:**

Failure to comply with the terms of this Policy will not be tolerated and may result in disciplinary action, including and up to, termination of employment or agreement.

#### **Enforcement:**

Websol intends to reduce the risk of bribery and corruption by:

- Establishing a clear policy with zero tolerance for non-compliance on ethical matters
- Obtaining commitment and support for conducting business in a fair, honest and transparent manner
- Empowering people of Websol to make appropriate decisions while carrying out business
- Ensuring all Websol people are being trained and awareness on the ethical matters
- Applying adequate due diligence and internal reviews of the business functions
- Communicating this Policy among all business and value chain partners to create awareness and maintain compliance
- Continuously assessing and enhancing ways to strengthen processes and systems to prevent any risk of bribery and corruption.