



(Approved on 18th May, 2023)

VINDHYA TELELINKS LIMITED

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ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

INTRODUCTION AND OBJECTIVE:

Vindhya Telelinks Limited (hereinafter referred to as “the Company”) is committed to conducting its businesses with honesty, transparency, and integrity. The Company recognizes the negative impact of bribery and corruption on its business operations, stakeholders and society at large. The Anti-Bribery and Anti-Corruption Policy (“the Policy”) aims to prevent bribery and corruption in all business activities of the Company and promote a culture of ethical behavior in accordance with established principles and ethos of the M.P. Birla Group among all the people to whom the Policy applies.

SCOPE:

The Policy applies to all directors, employees, consultants, contractors, and any other individuals who engage in business activities on behalf of the Company. It covers all key functional areas and business verticals/segments of the operation of the Company.

POLICY STATEMENT:

The Company prohibits any form of bribery and corruption, whether direct or indirect, in all its business activities e.g.-

- ❖ Offering or accepting bribes, kickbacks or other improper benefits to or from any individual or organization;
- ❖ Making facilitation payments to expedite routine government or administrative tasks;
- ❖ Engaging in fraudulent or unethical business practices; and
- ❖ Giving or receiving gifts, entertainment, or hospitality that may influence business decisions or create a conflict of interest.

RESPONSIBILITIES:

All persons to whom this Policy apply and extend besides being responsible for understanding and complying with the Policy are advised to –

- ❖ Refrain from engaging in any form of bribery or corruption.
- ❖ Report any suspected or actual breaches of this Policy to their supervisor, manager, or the Company's designated anti-bribery and anti-corruption officer.
- ❖ Cooperate with any investigation related to suspected or actual violations of this Policy.

TRAINING:

The Company may, if so required, provide training on the Policy and related practices to all persons covered by the scope of the Policy, interalia, on the following topics for having reasonable assurance of due compliance

- ❖ The Company's Anti-bribery and Anti-corruption Policy and procedures as prescribed,
- ❖ The legal and ethical implications of bribery and corruption,
- ❖ How to identify and manage situations that may involve bribery or corruption, and
- ❖ The consequences of violating the Policy.

PROCEDURE TO RAISE CONCERNS:

The Company encourages all persons to whom this Policy applies to raise concerns or report suspected or actual breaches of this Policy. The Company shall protect the confidentiality and anonymity of individuals who report in good faith. If any person is unsure whether a particular activity constitutes bribery or corruption or has any question or doubt in relation thereto, such person need to contact the Departmental Head or HR Head in writing or by email or report it immediately. All concerned need to follow the procedure outlined in the Company's Whistleblower Policy to report their concerns arising in terms of this Policy as well.

RECORD KEEPING:

The Company shall maintain reasonably accurate and relevant records of all business transactions to ensure transparency and accountability in accordance with applicable laws and regulations as in force from time to time.

CONSEQUENCES OF VIOLATION:

Any violation or departure from this Policy by any person to whom it applies and extends shall be subject to disciplinary action including termination of employment or contract, as the case may be. The Company may also take legal action against individuals or organizations involved in bribery or corruption, as legally and professionally advised.

CONCLUSION:

The Company is committed to conducting business with honesty, transparency, and integrity and expects all persons to whom this Policy applies to comply with this Policy and inculcate a culture of ethical behavior. The Company reserves the right to review and update this Policy as and when required to ensure its effectiveness and compliance with applicable laws and regulations as in force from time to time.