

Anti-Corruption and Anti-Bribery Policy

1. Introduction

Havells India Limited (“Havells”) does not tolerate corruption or bribery in any form and expects its employees to fully comply with requirements of all applicable anti-corruption laws, Havells’ Code of Conduct and that of this Policy. We expect strict adherence to ethical and transparent actions from all our employees and have zero tolerance to violations.

2. Policy Statement

Havells is committed to complying with all laws and regulations which govern our operations in every state in which we operate. This Anti-Corruption and Anti-Bribery Policy (the “Policy”) explains our responsibility to comply with anti-bribery and anti-corruption laws (as applicable).

Havells has a zero-tolerance attitude towards corruption and bribery. Even the suggestion of corruption may damage Havells reputation as well as its employees’ and affect its ability to do business. Havells is therefore committed to doing business ethically and expects its employees to follow and practice ethical business practices.

Any violation of this Policy may result in disciplinary action, up to and including dismissal in appropriate circumstances. It is therefore extremely important that employees must familiarize themselves with this Policy and strictly adhere to it.

3. Scope of Policy

The principles and obligations outlined in this Policy apply to all employees of entire Havells group. As such, each and every one is responsible for adhering to these standards in Havells business interactions.

4. Gifts, Hospitality and Donations

In developing or retaining commercial relationships, the act of giving or getting corporate hospitality can play a suitable role. Gifts and hospitality, however, are difficult if they generate real or perceived conflicts of interest or otherwise seem to affect a company choice.

The employees are forbidden to accept donations, discounts, favors, or services from an existing or potential client, competitor, supplier, or service provider. Extra care must be taken in functions such as procurement and sales.

5. Charitable contributions

Charitable contributions can only be given to needy people/organizations. All donations must be:

- *transparent and properly recorded in our books and records; and*
- *receipted or have a letter of acknowledgement from the charity to ensure that the donations receive the proper tax treatment.*
- *be compliant with local law, regulations or local or Business Unit internal policies*

6. Facilitation payments & Kickbacks

The Company prohibits employees making or accepting, facilitation payments or "kickbacks" of any kind. Typically, facilitation payments are tiny, informal payments made by an official to secure or speed up a routine action. Typically, kickbacks are payments made in exchange for a company benefit or benefit. All persons covered by this policy must prevent any activity that may result in the payment or kickback of facilitation

7. Responsibility of Individuals

Every individual covered by this policy must guarantee that they have read and understood this policy and must comply with this policy's terms and conditions at all times. It is the duty of all those who work for us or under our control to prevent, detect and report corruption. All individuals should avoid and prevent any activity that could result in any violation of this policy, or propose it. Individuals must notify their reporting manager or consult with any suitable member of the Human Resource (HR) team as quickly as possible if they think or suspect or have reason to think or suspect that a violation of this policy has happened or may happen in the future.

Any person who breaches any of the terms of this policy will face disciplinary action that may result in being dismissed.

8. Reporting potential misconduct/non conformance

Individuals are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with your reporting manager or consult an appropriate member of the Human Resource (HR) team.

9. Training & Communication

Dissemination of this policy for new joiners shall be carried out at the time of induction. This policy will also be shared with all current employees. If you have any query about this policy, you should contact your reporting manager.

10. Responsibility and Implementation

It is Havells' Human Resources Department responsibility for ensuring that this policy is complied with by all the employees. At branch and factory level, the respective heads are responsible for implementing this policy.

11. Monitoring & Review

All respective responsible persons will monitor the efficiency and review this policy's execution, taking into account its suitability, adequacy and efficiency on a regular basis. Any recognized improvements will be produced and integrated as quickly as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing. Individuals are invited to comment on this policy and suggest ways in which it might be improved. Comments,

suggestions and queries should be addressed to the Head –HR. This policy does not form part of the individual’s contract of employment and it may be amended at any time by the Company.