ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

Purpose

Fourth Partner Energy Pvt. Ltd. (hereinafter referred as FPEL), its subsidiaries & its Joint Ventures are committed to conducting business ethically and in a socially responsible manner. The purpose of this policy is to outline the firm's policy to be compliant with all applicable anti-bribery and corruption laws.

This policy guides us to act professionally, fairly and with utmost integrity in all our business dealings & relationships, where we operate or intend to operate. At large, the policy provides information and guidance on recognizing and dealing with bribery, corruption, money laundering & terrorism financing issues.

Objective

The objective of this policy is to ensure that appropriate anti- bribery & corruption procedures are in place to avoid any violations of applicable laws and regulations. The principles set forth in this policy mainly demonstrates our zero-tolerance approach to bribery, corruption, money laundering & terrorism financing.

Applicability

The principles set forth in this policy are applicable to all employees, business partners, suppliers, customers and financiers across FPEL, its subsidiaries & Joint Ventures. It is, therefore, the responsibility of all associated stakeholders to follow and adhere to all elements described in the Policy.

Scope

1. BRIBE, FACILITATION PAYMENTS OR KICKBACKS

- FPEL prohibits all forms of bribery & corruptions in all our business dealings.
- FPEL conducts its business ethically & lawfully and expects every associated stakeholder to adhere with it.
- Associated stakeholders shall never directly or indirectly, offer or pay or anything of that value to a government official, a private sector person/company to influence the judgment of the beneficiary in exercising his or her job duties, for an improper advantage for FPEL.
- Associated stakeholders shall never directly or indirectly, accept any money or item of value from an associate to influence his/her judgement/conduct in his/her job responsibilities or for gratification for a decision or act in a way that benefits the person of entity giving the item of value.
- FPEL (including its subsidiaries, joint ventures) does not make or accept, Facilitation Payments or Kickbacks of any kind. All Associated stakeholders must avoid any activity that may lead to a Facilitation Payment or Kickback will be made or accepted by FPEL.
- If any associated stakeholder is asked to make a payment on behalf of FPEL, he/she should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. Individuals should always ask for a receipt that details the reason for the payment. If there has been a case of any suspicion, concern/query regarding a payment, shall be raised through reporting mechanism without a delay or hesitation.
- If any FPEL employee or associated stakeholder encounter any of the following red flags while working with the FPEL, they shall report them promptly using the procedure set out in our "Whistle Blower Policy":
  - *Unexplained preferences for certain sub-contractors.*
  - *Invoices rendered or paid in excess of contractual amounts.*

- *You become aware that a third party engages in, or has been accused of engaging in, improper business practices.*
- *You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with government officials or officials*
- *A third-party request that you provide employment or some other advantage to a friend or relative.*
- *You receive an invoice from a third party that appears to be non-standard or customised.*
- *A third party insists on the use of side letters or refuses to put terms agreed in writing.*
- *You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.*
- *You are offered an unusually generous gift or offered lavish hospitality by a third party.*

The above list is not intended to be exhaustive and is for illustrative purposes only.

2. POLITICAL CONTRIBUTIONS

- FPEL is an apolitical company and therefore we do not make donations, contributions whether in cash or kind in support of political parties or candidates because we believe that such acts can be perceived as an attempt to gain an improper business advantage.

- However, if contributions are to be made to political parties, it shall be in accordance with the provisions of Companies Act 2013, and other applicable provisions in India and abroad.

- FPEL strictly prohibits the use of corporate offices, assets to any political person, political party, public officials for any unauthorized purpose.

3. ANTI-MONEY LAUNDERING & TERRORISM FINANCING

- FPEL is committed to minimizing the risk of our operations being used by money launderers and to prevent any financing of terrorism.

- FPEL will be compliant to all applicable laws & regulations on anti-money laundering & terrorism financing.

- We will not knowingly do business with anyone who we suspect of being connected with criminal or terrorist activity or who is subject to applicable trade sanctions.

- We will never knowingly participate in a scheme to launder money, under-report the size of a cash transaction or wrongfully avoid tax liability.

- Strive to fulfil international standards as detailed in the recommendations of the Financial Action Task Force (FATF).

4. GIFTS AND HOSPITALITY

- Provisions relating to gifts and hospitality are governed under the Gift Policy. Please refer to the Gift Policy for detailed guidance

5. EMPLOYEE RESPONSIBILITY

- Each FPEL employee shall ensure that he/she reads, understand, and complies with this policy. They should always, avoid any activity that might lead to breach of the principles listed in this policy.

- Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantages in order to obtain or retain business or other advantage from a third party, whether public or private.

- Employees must not accept any such advantage in return for any preferential treatment of a third party.
- Employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct or the attempt thereof.
- Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties.
- The prevention, detection and reporting of any form of bribery and corruption is the responsibility of each FPEL employee and one should think like that.
- FPEL employee should only deal with partners that they believe are legitimate and that have a reputation for integrity. Moreover, while engaging with business partners, FPEL employee should ensure that they comply with this policy.

6. TRAINING

To ensure that all FPEL employees and associated stakeholders are completely familiar with the principles of this policy, Business Integrity team of FPEL shall provide necessary trainings on Anti-bribery and corruption along with the principles & requirements of this policy.

7. DISCIPLINARY ACTION FOR NON-COMPLIANCE

FPEL employee who violates/breaches this policy shall be subject to disciplinary action which may include any of the following:

- Advising/Counselling.
- Formal apology.
- Hold promotion.
- Termination of services.
- Recovery of financial loss incurred.

Reporting Mechanism

- The Business Integrity Department will be the owner of this policy, and the Convenor of the Whistle-Blower Committee will be responsible for maintaining the record/register of complaints.
- FPEL recommends using the following channels to log/disclose your Report-
  1. By email to whistleblower@fourthpartner.co or
  2. By letter marked “Private & Confidential” and addressed to
     Mr. Shujath Bin Ali
     Chief Legal & Compliance Officer
     Fourth Partner Energy Private Ltd,
     5th floor, Sita City One,
     Venkatarambagh,
     Begumpet, Hyderabad, 500016
- FPEL encourages all suppliers, business partners and other stakeholders to report their queries/concerns should there be a case of violations/breach of the requirements of this policy.

- Internal FPEL employees are free to speak up to any member of the Whistle-Blower Committee through a dial-in call followed by an e-mail. However, a written communication duly signed by the complainant might be required, if requested.

- FPEL warrants that, all reports/queries/concerns will be addressed within due course time, which will be communicated to reporter as an acknowledgement to the report.

- All reports and records received through this mechanism shall be kept confidential and treated as Whistle Blower Report access of which will be restricted to the Whistleblower Committee member. FPEL Whistleblower Policy protects employees who report concerns in good faith.

Governance

Whistleblower committee shall periodically review this policy, engage with all stakeholders and lessons learned from handling of bribery cases shall be leveraged for continual improvement of this policy.

Date:

(Vivek Subramanian)
Executive Director