

## **Anti-Discrimination and Anti-Harassment Policy**

### **Transformers & Rectifiers (India) Limited's Code of Conduct states that,**

T & R is an "equal opportunity employer." The company shall not discriminate and will take "affirmative action" measures to ensure against discrimination in employment, recruitment, and advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the bases of race, creed, color, national origin, or sex.

T & R is committed in all areas to provide a work environment that is free from harassment. Harassment based upon an individual's sex, race, ethnicity, national origin, age, religion or any other legally protected characteristics will not be tolerated. All employees, including workers and other management personnel, are expected and required to abide by this policy. No person will be adversely affected in employment with the employer as a result of bringing complaints of unlawful harassment.

For Transformers & Rectifiers (India) Limited



Authorized Signatory



## REMEDIATION FOR CHILD LABOUR

### 1. SCOPE AND PURPOSE

#### 1.1 APPLICABILITY

The field of application covers all activities undertaken within the organisation or by suppliers or sub suppliers.

#### 1.2 OBJECTIVE

To ensure that child labour is not used. To define the procedures adopted to manage remedial actions in the event that child labour is used within the company or by suppliers.

### 2. DEFINITIONS

Child - Any person under 15 years of age, except in cases where local laws on minimum age establish a higher age for the performance of work or compulsory attendance at school, in which case, the relevant age is that applied in the local area.

### 3. PROCEDURE

#### 4.1 Child Labour

Where, following inspections at suppliers' premises, or through any other source of information, company personnel become aware of the use of child labour within the company or by its suppliers or sub-suppliers, they immediately shall inform the HR Dept or MR of the same.

The remedial actions to be implemented in the event that child labour is used are the following:

- Ensure the use of child labour is terminated as soon as possible;
- In the event that the financial situation of the family is particularly serious and could worsen as a result of the dismissal of the child, the company must strive, through the involvement, if necessary, of the local administrations, to recruit other family members of the minor;
- Ensure that the minor continues to attend school, committing itself or requiring the supplier to commit to bearing all necessary expenses (e.g. fees, purchase of books, other expenses) for the school attendance;
- Involve social workers, voluntary association, etc. which might assist in monitoring the situation of the minor and his family background.

Decisions are taken by common accord by Management, HR or MR or other individuals involved each time.

Approved By :

  
Authorized signature (Head HR )

Released on:



## **Anti-Corruption Policy**

### **1. Purpose**

Transformers & Rectifiers (India) Ltd. Is committed to conducting our business in accordance with all applicable laws, rules and regulations and the highest ethical standards, and this commitment.

The purpose of this Anti-Corruption Policy is to reiterate Transformers & Rectifiers (India) Ltd. commitment to full compliance by the Company, its subsidiaries and affiliates, and its officers, directors, employees and agents anti-corruption laws that may be applicable. This Policy

For the purposes of this Policy, a “contractor” or “supplier” is defined as a third-party entity or individual who provides, and receives payment for, services or goods related to any aspect of a Transformers & Rectifiers (India) Ltd. operation, and includes consultants and subcontractors. A “non-supplier vendor” is defined as a third-party individual, company, organization, and/or Government or Government-related entity that will receive payment from Transformers & Rectifiers (India) Ltd. but will not provide goods or services in return.

### **2. SCOPE**

This Policy is applicable to every employee of Transformers & Rectifiers (India) Ltd. The reporting requirement of this Policy is also applicable to Transformers & Rectifiers (India) Ltd. contractors and suppliers. This Policy is intended to supplement all applicable laws, rules, and other corporate policies. It is not intended to supplant any local laws.

### **3. DEFINITION**

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person’s views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of:

- Cash payments;
- Phony jobs or “consulting” relationships;
- Kickbacks;
- Political contributions;
- Charitable contributions;
- Social benefits; or Gifts, travel, hospitality, and reimbursement of expenses.



#### **4. POLICY REQUIREMENTS**

Transformers & Rectifiers (India) Ltd. personnel and agents are strictly prohibited from offering, paying, promising, or authorizing:

- any payment or other thing of value;
- to any person;
- directly or indirectly through or to a third party;
- for the purpose of (i.e., in exchange for);
  - causing the person to act or fail to act in violation of a legal duty
  - causing the person to abuse or misuse their position; or
  - securing an improper advantage, contract or concession;
- for Transformers & Rectifiers (India) Ltd. or any other party.

No Transformers & Rectifiers (India) Ltd. personnel shall undertake any Improper Payment Activity in respect of a foreign official, a domestic official, or a person doing business in the private sector.

In addition, Transformers & Rectifiers (India) Ltd.'s books and records must correctly record both the amount and a written description of any transaction. Transformers & Rectifiers (India) Ltd. personnel must ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company's books and records.

It is contemplated that Transformers & Rectifiers (India) Ltd. will institute detailed procedures and standards related to training, due diligence, the recording of transactions, and other areas, to implement the terms of this Policy. In particular, Transformers & Rectifiers (India) Ltd. will institute standards and procedures for:

- Sponsoring travel of government or government officials;
- Direct and in-kind support for government or government officials;
- Security support for public law enforcement;
- Agreements with government-affiliated third parties, including those who may interact with the government on Transformers & Rectifiers (India) Ltd.'s behalf or benefit;
- Contracting with state-owned entities;
- Meals, gifts, and entertainment for government officials;
- Charitable and cultural donations to government or government officials, or to those parties affiliated with them; and
- Political contributions.



**Transformers & Rectifiers (India) Limited**

**Doc. No.**

**Anti Corruption Policy**

**HR/PD/AC/o**

## **5. AUDITS**

Audits of Transformers & Rectifiers (India) Ltd. sites, operating units, and contractors may be conducted periodically to ensure that the requirements of this Policy and applicable procedures and guidelines are being met. Audits may be conducted internally by Transformers & Rectifiers (India) Ltd., or externally by retained third parties. Audit documentation shall include performance improvement action plans.

## **7. WAIVER**

There is no permitted deviation or waiver from this Policy.

## **8. DISCIPLINE**

Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to Transformers & Rectifiers (India) Ltd. management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

**Approved By :**

Head HR

**Released on:**