



Anti-Bribery and Anti-Corruption Policy



Document Number: SWREL/HR/05

Document Owner: HR Department

Approved On: 07.09.2025

Purpose

Sterling and Wilson Renewable Energy Limited (SWREL) is committed to conducting business ethically, transparently, and in compliance with all applicable laws and regulations. This Anti-Bribery and Anti-Corruption Policy outlines the company's strict prohibition against bribery and corruption in all forms, in line with the standards set by the Global Reporting Initiative (GRI) and EcoVadis.

Scope

This policy applies to all employees, officers, directors, contractors, consultants, agents, and any third parties acting on behalf of SWREL, regardless of their location. The policy covers all business dealings, including those with public officials, private individuals, companies, and other entities.

- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence the actions of an individual in a position of power.
- **Corruption:** The abuse of entrusted power for private gain, which can take many forms, including bribery, fraud, extortion, and nepotism.
- **Facilitation Payments:** Small, unofficial payments made to expedite or secure the performance of routine government actions.

Policy Statement

SWREL strictly prohibits any form of bribery or corruption, whether directly or through third parties. This includes but is not limited to:

- **Giving Bribes:** Offering, promising, or giving any financial or other advantage to influence the decision-making process of another party.
- **Receiving Bribes:** Accepting or soliciting any financial or other advantage as an inducement or reward for actions in connection with SWREL's business activities.
- **Facilitation Payments:** These are strictly prohibited under this policy, even if they are common practice in a particular location.
- **Third-Party Bribery:** Engaging or allowing third parties to engage in bribery or corruption on behalf of SWREL is forbidden.

Compliance with Laws and Standards

SWREL is committed to adhering to all applicable anti-bribery and anti-corruption laws, including the Prevention of Corruption Act, 1988 (India), the UK Bribery Act, 2010, and the US Foreign Corrupt Practices Act (FCPA), 1977. Compliance with GRI (Global Reporting

Initiative) Standard 205: Anti-corruption and the EcoVadis assessment criteria is mandatory.

Responsibilities

- **Employees:** Must comply with this policy, report any suspected bribery or corruption, and avoid any activities that could lead to or imply a breach of this policy.
- **Management:** Must ensure the policy is communicated effectively, provide training, and act upon any reports of violations.
- **Compliance Officer:** Responsible for monitoring the implementation of the policy, investigating any breaches, and reporting to the Board of Directors.

Due Diligence

SWREL conducts thorough due diligence on all third parties, including suppliers, agents, and joint venture partners, to mitigate the risk of bribery and corruption. This includes:

- **Background Checks:** Assessing the integrity and compliance history of third parties.
- **Contractual Clauses:** Including anti-bribery and anti-corruption clauses in all contracts.
- **Ongoing Monitoring:** Regularly reviewing and auditing third-party relationships to ensure ongoing compliance.

Reporting and Whistleblowing

Employees and third parties are encouraged to report any suspected or actual bribery or corruption activities through SWREL's whistleblowing mechanism. Reports can be made anonymously, and all reported concerns will be investigated promptly and confidentially.

- **Protection Against Retaliation:** SWREL ensures that no employee will suffer demotion, penalty, or other adverse consequences for refusing to engage in bribery or corruption, even if such refusal results in the company losing business.

Training and Communication

SWREL will provide regular training to all employees on anti-bribery and anti-corruption laws and practices. The policy will be communicated to all employees, third parties, and stakeholders to ensure a clear understanding of SWREL's zero-tolerance approach to bribery and corruption.

Penalties for Non-Compliance

Any breach of this policy may result in disciplinary action, up to and including termination of employment or business relationships. SWREL reserves the right to pursue legal action against individuals or entities involved in bribery or corruption.

Continuous Improvement

SWREL is committed to the continuous improvement of its anti-bribery and anti-corruption measures. The policy will be reviewed annually and updated as necessary to reflect changes in laws, standards, and business practices.

Approved On:
07.09.2025

Approved By:
SWREL Management

-----X-----X-----