

### **Policy on Fraud and other Corrupt Practices**

#### Purpose:

The purpose of this policy is to ensure that MSSSPL continues to maintain its high standards of accountability and transparency, and provide a clear guidance to employees and others on how fraud and other corrupt practices will be dealt with.

This policy is intended to increase awareness, outline roles and responsibilities for employees and others, and establish processes to deal with "fraud" and "other corrupt practices" at MSSSPL.

## Scope and Applicability:

This Policy is applicable to all employees whether on payrolls or contractual.

This Policy comes into force on April 1, 2017 and replaces any previous version of the existing policy on Fraud and other Corrupt Practices.

#### Philosophy:

MSSSPL does not tolerate any form of fraud and other corrupt practices in relation to any of our business dealings. We do not offer or accept bribes or kickbacks in any form.

Compliance with this policy is mandatory

Fraud and corruption have the potential to cause significant financial and reputational harm. It can diminish or destroy the confidence of all stakeholders in MSSSPL. We are committed to prevent, detect and respond actively to all incidents of fraud and corruption.

We are committed to the highest levels of integrity and all our employees are expected to show high level of objectivity, honesty and transparency in their daily conduct within and outside the organization.

For more clarity and details please refer the related Procedure document.

# Policy Review & Interpretation:

- The Apex Committee of MSSSPL, is responsible for the interpretation of the policy and its guidelines as per the defined clauses mentioned in this document and reserves the right to add, delete and modify any clause without prior notice.
- This policy will be reviewed every 2 years or earlier, as deemed fit by the Apex Committee
- The Apex Committee consists of 5 members MD, CFO, CTO,CMO, CGO, CEO(Rings), COO and Sr VP-HR