

	Pheon AutoTech Pvt Ltd	Format Ref.	F-MR-05
Format Name	Controlled Guidelines & Policies	Rev No/Dt	02/ 09.02.2022

Sec.	Description	Particulars			
1	Particulars	Type of Guideline	Policy ☒ Guidelines ☐		
		Name	Anti-Bribery Policy		
		Ref.	G-H-09		
		Department	Human Resource		
2	Purpose				

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5	Guideline / Policy
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1. Definition

Corruption/ Bribery 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 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
- "Consulting" relationships
- Kick back
- Political contributions
- Charitable contributions
- Social benefits
- Gifts, travel, hospitality, and reimbursement of expenses.

2. Waiver

There is no permitted deviation or waiver from this Policy.

3. 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 and/or civil/criminal prosecution as per the law of the land. Any third-party agent who violates the terms of this Policy, who knows of and fails to report to Pheon 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, they are also subject to criminal/civil prosecution under the law of the land.

4. Employees Responsibility

As an employee of PHEON, they must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti -bribery and corruption information you are given. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify it to the company investigator appointed for ethical business practice enforcement by top management.

5. How to Raise Concern

If you suspect that there is an instance of bribery or corrupt activities occurring in relation to PHEON, you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behavior can be considered bribery or corruption, you should write to your line manager, immediate senior, HOD, Top Management. If you have reason to believe that this is not the right channel to clear your doubts, please take them to the HR Department without any fear of retribution. Your interests will be protected irrespective of the accuracy of your suspicion.

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6. What to do if you are a victim of Bribery or Corruption

You must write your HOD as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7. Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, PHEON understands that you may feel worried about potential repercussions. PHEON will support anyone who raises concerns in good faith under this policy; even if investigation finds that they were mistaken.

PHEON will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should inform your line manager or the HR manager immediately.

Mala-fide use of this policy is an act of corruption. Where an employee approaches the Investigator with a false complaint or suspicion with the objective of causing hurt to another employee that is mala fide use of this policy.

PHEON is a zero-tolerance employer. If an employee is terminated on grounds of corruption, the said fact will be recorded in their employment record and will be mentioned in all future reference checks made for that employee by any agency.

8. Training & Communication

PHEON will provide training on this policy as part of the induction process for all new employees. Employees will also receive training annually on how to adhere to this policy, and will be asked to formally accept that they will comply with this policy.

PHEON's anti-bribery and anti-corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third parties at the outset of business relations, and as appropriate thereafter.

As a good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities. PHEON will provide relevant anti-bribery and corruption training to employees. Where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced.

9. Record Keeping

PHEON will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

APPROVED

By MR at 4:18 pm, Sep 02, 2025

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Annexure-I (G-H-09)

Anti-Bribery & Corruption Form

To be completed by the grievant

Informer Information			
Employee Name		Employee ID	
Job title		Department	
Supervisor		Date	

Incident details			
Date, time, and location of the incident			
Witnesses (if applicable)			
Description of the incident (Describe the incident in detail. Include the names of individuals involved, if applicable.)			
Violations of policies/guidelines (List policies and guidelines that you believe have been violated during the incident.)			
Has this been discussed with HR department Earlier?	☐ Yes	☐ No	☐ Other, please specify:

Action Taken

Employee signature	
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Received by	
Name	
Date	
Signature	

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Sec.	Description	Details			
		Particulars		From	Reference
6	Inputs	Annexure-I		G-H-09	
7	Outputs	Filled Document of Annexure-I			
8	Monitoring & Measurement	Frequency		KPI	Responsibility
		Yearly		Resolution Rate – 100 %	Manager HR
9	Revision History	Rev No.	Details of Revision	Date	DCR No.
		00	INITIAL RELEASE	01.09.2025	
		01			
10	Format Usage Related	Format Template Loc.	Not Applicable		
		Document Retention Format	Policies	To be Stamped and Signed by MD and then Retained in PDF Format.	
			Guidelines	Controlled Document to be retained in PDF Format	
		Document Retention Loc.	PAT Svstems Data > PAT - Document Resource > Controlled - PAT - Guidelines and Policies > Human Resource (H) Related > Controlled G-H-09- Anti-Bribery Policy		
		Retention Period	Perpetual		
	Circulation	MD, MIS, All Team members			
11	Abbreviations				
12	Document Control	Particulars	Name	Date	Sign
		Prepared By	Devinder Singh	01.09.2025	
		Approved By	Gaurav Singhal	01.09.2025	
		Controlled By	Mayank Mishra	01.09.2025	

APPROVED
By MR at 4:18 pm, Sep 02, 2025