

## **POLICY ON INTERACTION WITH PUBLIC OFFICIALS**

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## POLICY ON INTERACTION WITH PUBLIC OFFICIALS

### 1. PURPOSE

The purpose of this document is to set out the guidelines and procedures for interaction with Public Officials (*defined below*) by the Covered Persons (*defined below*) of Madhucon Projects Limited (“**Company**”) (hereinafter referred to as the **Policy**). This Policy seeks to ensure that all such interactions are done in accordance with applicable laws and regulations, established corporate business principles, and are conducted transparently and professionally.

### 2. SCOPE

The Policy is applicable to individuals working at all levels and grades, including directors, senior executives, senior managers, officers, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, interns, seconded staff, clients, vendors, suppliers, contractors, auditors, agents, and *inter alia* any third party intermediaries engaged by the Company and any such person as may be designated by the board of directors of Madhucon Projects Limited (**Board**) from time to time to interact with Public Officials (all of the aforesaid being collectively referred to as **Covered Persons**).

For the purpose of this Policy, the term “**Public Official**” means anyone in the service, of the Central Government, State Government or an instrumentality of the Central and State Government, foreign public official and includes *inter alia*, persons employed by any government ministry, employees of public and private sector bank, department or agency of any government ministry, an official of a political party, or a candidate for political office, members of Parliament or other legislative bodies, ministers of finance or other financial regulators, governors or provincial or district leaders, members of the judiciary, government enforcement authorities, anyone working in city and local governments, at any level ~~etc and includes~~etc, includes the immediate family of such Public Officials and employees and representatives of public international organizations.

### 3. GENERAL PRINCIPLES

- 3.1 Any interaction with Public Officials by the Covered Persons including formal or informal engagements with Public Officials must comply with applicable laws and regulations, the Company’s Code of Business Conduct and other relevant policies. These principles underpin open, transparent, and responsible interactions with Public Officials. These principles also apply whenever a third party is acting on behalf of Company in such interactions with Public Officials.
- 3.2 When interacting with public authorities, Covered Persons must at all times act with honesty, integrity, in a fair and professional manner; and must always be open, transparent and accurate about the purpose of the interaction. Covered Persons must, before establishing formal or informal representation to Public Officials on behalf of Company, disclose their identity and relationship with Company, the purpose of the representation and Company’s position or standpoint.
- 3.3 In situations not governed by specific laws or internal rules, Covered Persons shall use good judgement and common sense, always guided by the principles set out under this Policy and in case of reasonable doubt, seek advice and direction from the Ethics and Compliance Officer.

- 3.4 Covered Persons must never, directly or indirectly or through intermediaries, offer or promise any financial or other advantage to Public Officials for the purpose of obtaining information or influencing their decision-making. Moreover, the Covered Persons must refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof.
- 3.5 While engaging with any Public Official or employing former Public Officials, measures should be taken to fully understand and comply with the rules and regulations laid down by the government, the relevant institution and with established best-practices particularly with regard to confidentiality and potential conflict of interest.
- 3.6 The Company shall ensure all appropriate records are maintained by all Covered Persons of their interactions with Public Officials.

#### **4. CONFIDENTIALITY IN INTERACTIONS WITH PUBLIC OFFICIALS**

- 4.1 Covered Persons shall take care to ensure that no confidential information is disclosed to Public Officials. Under exceptional circumstances and for very specific and limited purposes, confidential information may be disclosed after prior consultation with the Ethics and Compliance Officer.
- 4.2 Covered Persons should interact with Public Officials over any official phone/handset provided by Company, WhatsApp or text messages over such official phone/handset, and official email ID provided by Company. No interaction with Public Officials should be done using any personal device. As far as possible, all Covered Persons should interact with Public Officials through emails.
- 4.3 All Covered Persons should ensure that all the interactions with Public Officials is accurately and properly documented.

#### **5. PROHIBITED ACTIVITIES**

With respect to national and foreign Public Officials, and without the following list being exhaustive, it is strictly prohibited to:

- 5.1 Directly or indirectly or through intermediaries, offer or promise any financial or other advantage to Public Officials for the purpose of obtaining information or influencing their decision-making. Employees must not offer, give or accept undue benefits of any nature such that: (i) officials perform any action that relates to the company, or for having performed them; or (ii) another public official is influenced to make decisions that can benefit or compromise the company (iii) internships or employment to relatives or referees of Public Officials (iv) gifts, hospitality and entertainment (as referred to under the Gifts, Hospitality and Entertainment policy) and (v) any facilitation payment
- 5.2 Exercise undue influence over a public official with whom there is a personal relationship (of kinship, friendship, mutual business, politics, etc.) in order to obtain a resolution from them beneficial to the interests of Company.
- 5.3 Request or accept a benefit of any kind in exchange for unduly influencing an authority or public official.

- 5.4 Contribute to a public official to remove or divert funds that are in their charge.
- 5.5 Facilitation payments are not legal and are therefore prohibited in all places and circumstances. “Facilitation payments” are understood to mean payments made to public officials to expedite acts or routine public procedures, such as the processing of visas, permits, customs procedures, etc. Further, in case of any request of a facilitation payment, it should be promptly documented and reported to Ethics and Compliance Officer.
- (a) The contact details of Ethics and Compliance Officer are as follows:
- Mr. K. Venkateshwarelu: [cco@madhucon.com](mailto:cco@madhucon.com)**
- 5.6 The Company shall impose restrictions (as appropriate and for a reasonable period of time) on employing/engaging for remuneration former Public Officials, especially where such employment relates directly to the functions held or supervised by those public officials during their tenure or over which they continue to be able to exercise material influence.