

## AN ETHOS OF ANTI-CORROPTION & PROMOTING ETHICAL BEHAVIOUR

### Our Commitment

As per the ESPL code of conduct , the company adhere to a strict policy against any corrupts practices. The policy on gifts and donations, as explicitly mentioned in ESPL CoC is reproduced below:

“ESPL and its employees shall neither receive nor offers or make, directly or indirectly, any illegal payments, remuneration, gifts, donations, or comparable benefits that are intended to, or perceived to obtain business or uncompetitive favors for the conduct of its business. However a ESPL company and its employee may accepts and offer nominal gifts which are customarily given and are of memorial natural for special events.”

Any complaints regarding corrupts practices processed through the Ethics Manager. An environment of legal behavior is ensured by identifying all the applicable legal norms and ensuring their compliance through regular review and process audits. The internal audits departments strengthens the process of legal compliance by caring out periodic audits, reporting shortcomings and also suggesting

Means for improvements. Ethics behavior is reinforced by adopting of the CoC, value and their development through the various approaches related to communication and training.

The key process adopted in caring the message of ethical conducts and desired behavior is as follows:-

### KEY PROCESS/INDICATORS OF ETHICAL BEHAVIOUR

<u>Stakeholders</u>	<u>Key processes</u>	<u>Key measures</u>
Suppliers/vendors	<ul style="list-style-type: none"> <li>• Vendors selection</li> <li>• Interactions</li> <li>• CoC</li> </ul>	<ul style="list-style-type: none"> <li>• complaints</li> </ul>
Employees	<ul style="list-style-type: none"> <li>• Values</li> <li>• Training</li> <li>• Communication by ESS</li> </ul>	<ul style="list-style-type: none"> <li>• Complaints</li> <li>• Act of misconduct</li> <li>• Ess feedback</li> </ul>