
 An ISO/TS 16949 Certified Enterprise	DYNA-K AUTOMOTIVE STAMPINGS PVT LTD	Doc. No. :	QF/14/15
		Rev. No. :	00
		Rev. Date :	1/12/2017
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ANTI BRIBERY / ANTI – CORRUPTION POLICY

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1. Objective

Dyna-K Automotive Stamping Pvt. Ltd or the “Company” is committed to the prevention, deterrence and detection of fraud, bribery and all other corrupt business practices. It is DYNA-K AUTOMOTIVE STAMPING LTD.’s policy to conduct all of its business activities with honesty, integrity and the highest possible ethical standards and vigorously enforce its business practice, wherever it operates throughout the world, of not engaging in bribery or corruption.

2. Scope and applicability

This Anti-bribery and Anti-corruption Policy (this “Policy”) applies to all individuals working for all affiliates and subsidiaries of DYNA-K AUTOMOTIVE STAMPING LTD. at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, or any other person associated with DYNA-K AUTOMOTIVE STAMPING LTD. (collectively referred to as “You” or “you” in this Policy).

In this Policy, “Third Party(ies)” means any individual or organization, who / which come into contact with DYNA-K AUTOMOTIVE STAMPING LTD. or transact with DYNA-K AUTOMOTIVE STAMPING LTD. and also includes actual and potential clients, suppliers, business contacts, consultants, intermediaries, representatives, subcontractors, agents, advisers, joint ventures and government & public bodies (including their advisers, representatives and officials, politicians and political parties).


3. Policy details

A bribe is an inducement, payment, reward or advantage offered, promised or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe. It is also a separate offence to bribe a government/ public official. “Government/ public official” includes officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind in a country or territory. A bribe may be anything of value and not just money -- gifts, inside information, sexual or other favors, corporate hospitality or entertainment, offering employment to a relative, charitable donation or social contribution, abuse of function -- and can pass directly or through a third party.

Corruption includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

4. Gifts and hospitality

Employees or members of their immediate families (spouse, mother, father, son, daughter, brother, sister or any of these step- or in-law relationships, whether established by blood or marriage including common law marriage) should not provide, solicit or accept cash or its equivalent, entertainment, favors, gifts or anything of substance to or from competitors, vendors, suppliers, customers or others that do business or are trying to do business with DYNA-K AUTOMOTIVE

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STAMPING LTD. Loans from any persons or companies having or seeking business with DYNA-K AUTOMOTIVE STAMPING LTD., except recognised financial institutions, should not be accepted. All relationships with those who DYNA-K AUTOMOTIVE STAMPING LTD. deals with should be cordial, but must be on an arm's length basis. Nothing should be accepted, nor should the employee have any outside involvement, that could impair, or give the appearance of impairing, an employee's ability to perform his/her duties or to exercise business judgment in a fair and unbiased manner.

This Policy does not prohibit normal and appropriate gifts, hospitality, entertainment and promotional or other similar business expenditure, such as calendars, diaries, pens, meals and invitations to theatre and sporting events (given and received), to or from Third Parties.


However, the key determining factor for appropriateness of the gift or hospitality and/or its value would be based on facts and circumstances under which such gift or hospitality is provided. The practice of giving gifts and hospitality is recognised as an established and important part of doing business. However, it is prohibited when they are used as bribes. Giving gifts and hospitality varies between countries and sectors and what may be normal and acceptable in one country may not be so in another.

To avoid committing a bribery offence, the gift or hospitality must be:

- a. Reasonable and justifiable in all the circumstances
- b. Intended to improve the image of DYNA-K AUTOMOTIVE STAMPING LTD., better present its products and services or establish cordial relations

The giving or receiving gifts or hospitality is acceptable under this Policy if all the following requirements are met:

- a. It is not made with the intention of influencing a Third Party to obtain/ retain business or a business advantage or to reward the provision or retention of business or a business advantage or in explicit or implicit exchange for favors/ benefits or for any other corrupt purpose
- b. It complies with local laws and customs
- c. It does not include cash or a cash equivalent
- d. It is appropriate in the circumstances. For example, in U.S. it is customary for small gifts to be given at Christmas time
- e. Taking into account the reason for the gift or hospitality, it is of an appropriate type and value and given at an appropriate time
- f. It is given openly, not secretly and in a manner, that avoids the appearance of impropriety

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5. What is not acceptable?

It is not acceptable for any employee of DYNA-K AUTOMOTIVE STAMPING LTD. (or someone on his / her behalf) to:

- Accept an offer of a gift of any size from any Third Party which is in negotiation with, or is submitting a proposal with DYNA-K AUTOMOTIVE STAMPING LTD.
- Give, promise to give or offer, any payment, gift, hospitality or advantage with the expectation or hope that a business advantage will be given or received or to reward a business advantage already given
- Give, promise to give or offer, any payment, gift or hospitality to a government official, agent or representative to “facilitate” or expedite a routine procedure
- Accept or solicit any payment, advantage, gift or hospitality from a Third Party that you know or suspect is being offered with the expectation that it will obtain a business advantage for them
- Threaten or retaliate against, another employee who has refused to commit a bribery offence or who has raised concerns under this Policy
- Engage in any activity that might lead to a breach of this Policy

6. Willful blindness


If an employee willfully ignores or turns a blind eye to any evidence of corruption or bribery within his / her department and/or around him / her, it will also be taken against the employee.

Although such conduct may be “passive”, i.e. the employee may not have directly participated in or may not have directly benefited from the corruption or bribery concerned, the willful blindness to the same can, depending upon the circumstances, carry the same disciplinary action as an intentional act.

7. Business relationships

DYNA-K AUTOMOTIVE STAMPING LTD. expects all Third Parties doing business with DYNA-K AUTOMOTIVE STAMPING LTD. to approach issues of bribery and corruption in a manner that is consistent with the principles set out in this Policy. DYNA-K AUTOMOTIVE STAMPING LTD. requires all Third Parties to cooperate and ensure compliance with these standards, to continue the business relationship. In order to maintain the highest standards of integrity, with respect to any dealings with a Third Party, you must ensure that:

- Employees and associates shall conduct due diligence enquiries to review the integrity records of any Third Party before entering a commercial relationship with them
- Employees and associates shall fully document the engagement process and the final approval of the selection of any Third Party
- Employees and associates shall implement a program to provide appropriate information on this Policy to all Third Parties engaged in business relationship with DYNA-K AUTOMOTIVE STAMPING LTD.
- Employees and associates shall ensure that:
 - Each Third Party within your work area are fully briefed on this Policy and have made a formal commitment in writing to abide by it

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- Fees and commissions agreed will be appropriate and justifiable remuneration for legitimate services rendered
- Contractual agreements will include appropriate wording making it possible to withdraw from the relationship if any of the Third Parties fail to abide by this Policy In the event of any doubt on the integrity of a Third Party, it is the employee's responsibility to contact his / her Manager and the Whistleblower Committee

8. What we expect from an employee

Employees are the pillars of this organization and are behind each DYNA-K AUTOMOTIVE STAMPING LTD. success story. Every employee must ensure that he / she shall read, understand and comply with this Policy.

If any employee has doubts or concerns, he / she should contact his / her Manager or the Whistleblower Committee. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for DYNA-K AUTOMOTIVE STAMPING LTD. or under DYNA-K AUTOMOTIVE STAMPING LTD.'s control.


Employees are required to avoid any activity that might lead to or suggest a breach of this Policy. Employees must notify his / her Manager and the Whistleblower as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred or may occur in the future.

Any employee who breaches this Policy will face disciplinary action, which could result in dismissal. We reserve our right to terminate our contractual relationship with you if you breach this Policy.

9. What to do if you are a victim of bribery and corruption?

It is his / her responsibility to inform / report it to their respective Managers and the Whistleblower Committee as soon as possible if you are offered a bribe by a third party, you are asked to make one, suspect that this may happen in the future or believe that you are a victim of another form of corruption or other unlawful activity.

You must refuse to accept or make the payment from or to a third party, explain our policy against accepting or making such payment and make it clear that the refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your Manager.

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10. Who is responsible for the Policy?

The Chief Executive Officer has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it.

Team Leaders at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on how to implement and adhere to it and also monitor compliance of it.

The Compliance/ HR team is responsible for this Policy and for monitoring its use and effectiveness (and dealing with any queries on its interpretation).


11. Waiver and amendment of the policy

We are committed to continuously reviewing and updating our policies and procedures based on the learning. The Compliance/ HR team will monitor the effectiveness and review the implementation of this Policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Therefore, this document is subject to modification. Any amendment or waiver of any provision of this Policy must be approved in writing by the Company's Board of Directors. The Policy will be reviewed and audited from time to time, which requires cooperation from all concerned.

Annexure A - Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of your employment for DYNA-K AUTOMOTIVE STAMPING LTD. and which may raise concerns under anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working, you have responsibility to report them promptly to your Manager and the Whistleblower Committee

- You suspect or become aware that a Third Party engages in, or has been accused of engaging in, improper business practices
- You learn that a Third Party has a reputation for paying bribes or requiring that bribes are paid to them or has a reputation for having a "special relationship"
- A Third Party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a function or process for us
- A Third Party requests payment in cash and/or refuses to sign a formal contract or to provide an invoice or receipt for a payment made
- A Third Party requests that payment is made to a country or geographic location different from where the third party resides or conducts business
- A Third Party demands lavish entertainment, hospitality or gifts before commencing or continuing contractual negotiations or provision of services
- A Third Party requests that you provide employment or some other advantage to a friend or relative
- You receive an invoice from a Third Party that appears to be nonstandard or customized

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- i. A Third Party insists on the use of side letters (i.e. agreed terms in a letter or other document outside the written contract between the parties) or refuses to put the agreed terms in a written contract
- j. Third Party requests/ requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us
- k. You are offered an unusually generous gift or offered lavish hospitality by a Third Party
- l. You become aware that a colleague, other employee or contractor working on our behalf requests a payment from a Third Party (such as a client) to expedite an activity (such as an inspection or paperwork) or to “overlook” potential legal or regulatory violations