

HAPPY FORGINGS LIMITED

ANTI-CORRUPTION AND ANTI MONEY LAUNDERING POLICY

Version	Approval date	Description
Version 1	February 7, 2025	original
Version 2	August 9, 2025	Amended

Policy Objective

HFL practices a zero-tolerance approach to bribery and corruption. It guides us to act professionally, fairly and with utmost integrity.

Policy Scope

All employees and all third parties of Happy Forgings Limited.

Definition:

A **Bribe** is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Corruption is dishonest behaviour by those in positions of power, such as Managers/HODs. Corruption can include giving or accepting bribes or inappropriate gifts, under-the-table payments or benefits, diverting funds, laundering money and defrauding investors.

Third party means any individual or organisation who has business dealings with the Company.

Anti-Money Laundering Laws, "Anti-Bribery Laws" and "Anti-Corruption Laws" means all applicable anti-bribery and anti-corruption laws / statutes / regulations / guidelines / codes stipulated by relevant governmental authorities. (Collectively referred as 'AML & ABAC Laws').

Examples:

- Cash, gifts, travel and entertainment, in exchange for awarding or retaining business.
- Purchase material/equipment on higher rates than market rates.
- Take bribe in lieu of giving preference in service such as loading/unloading of vehicles inside company.

Policy Guidelines

- All employees shall ensure that they have read and understood this Policy and must at all times comply with its requirements.
- The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the Company or under its control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- Employees shall notify or consult CHRO, as soon as possible, if they believe or suspect or have a reason to believe or suspect, that a breach of this Policy has occurred, or may occur in the future.
- All employees must also ensure that they do not engage in or facilitate money laundering, and must report any suspicious financial activities in line with anti-money laundering regulations.

Raising a concern and Protection

- All employees are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage.
- If they are unsure whether a particular act constitutes bribery or corruption, or if they have any other queries, these should be raised with the CHRO. Concerns should be reported by following the procedure set out in "Whistle-Blower" policy.
- An employee who refuses to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions;

HFL aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Donations

- No donation must be offered or made without seeking the prior opinion of the MD/CMD.

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

- It is important that you tell your HOD or CHRO as soon as possible if you are offered a bribe by a third party or are asked to give a bribe or suspect that this may happen in the future.

Penalties

- An employee who breaches any terms of this Policy shall face disciplinary action, up to and including dismissal.
- The Company reserves the right to terminate a contractual relationship with third parties or associated persons if they breach this Policy.
- The Company may also report the matter to relevant authorities.

Policy Review

The Board reserves its right to review and amend this Policy, if required, to ascertain its appropriateness as per the needs of the Company

Dissemination of Policy

This Policy shall be hosted on the website of the Company .