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Procedure and Policy of Anti Bribery and Anti Corruption

1.0 Purpose:

R.K.Industries takes its responsibility for ensuring the establishment and maintenance of systems of internal control for the prevention and detection of fraud, irregularities and corruption as non-negotiable and will not tolerate fraud, corruption or abuse of position for personal or institutional gain.

It is a criminal offence to offer, promise or provide, or request or accept a bribe from the organizations in where RKI has business. It is also an offence to fail to prevent an incident of bribery committed either by RKI or by someone associated with it in order to obtain or retain a business advantage.

2.0 Scope:

This anti-bribery and corruption policy applies to the Managing Partners, all members of staff / employees whether temporary or permanent, all agents, contractors, consultants and intermediaries whether or not they are based in the Tamilnadu.

Where bribery may be seen as part of the way business is done or as a "local practice" it must be clear that RKI will not participate in or condone any form of bribery.

3.0 List of Abbreviations :

•RKI – R.K.INDUSTRIES

4.0 Terms and Definitions:

Bribery: bribes can come in many forms and are not limited simply to acceptance of cash by an individual. Donations to RKI, sponsorship arrangements, personal gifts, hospitality and entertainment can be bribes if they are intended to influence RKI decision making.

Corruption includes dishonest and or illegal behavior, perversion of integrity, and bribery.

Supplier : Who supplies Raw material, Consumables, etc to RKI are referred as suppliers.

Sub-Supplier : Who do job work to RKI are referred as Sub Suppliers.

Logistics : Who provide service to RKI for Material transport to its Customer / Supplier / Sub-supplier. Logistics service provided by both External agency and Own vehicle of RKI.



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1. Responsible:

The Managing Partners, Mr.K.Kuber and Mr.K.Srinivasa rao and each employees are committed to full compliance with the provisions of this procedure. RKI's Anti -Bribery and Anti -Corruption policy confirms this commitment. No form of bribery or corruption will be tolerated. This commitment is underpinned by RKI's values of honesty and openness.

2. Examples of Bribery and Corruption :

5.1.1 For Marketing Manager & Executive(s) :

- Offering bribes / Gift / Payments to any Representative at Customer's end to avail new business, Quotation approval, Schedule increase, Competitor's Price sharing etc.,
- Sharing our Quotation to other companies.
- Sharing our new inquiries to other companies.
- Sharing our client details to other companies.

5.1.2 For Purchase Manager & Executive(s) :

1.Shouldn't get or accept gift / cash etc., from any supplier in order to make them benefit for the following.

- > Buying inferior product.
- > Ordering non-consumable product.
- > Placing high volume than actual requirement.
- > To enroll disqualified Supplier in Approved list.
- > Approving Supplier quotation by doing Eye wash negotiation.
- > Encourage or influencing any Quality/Production representative to pass on the defective part.
- > Not raising Penalty for shortages identified during Material Reconciliation.
- > Getting fake tenders and approving the price of None source.

2.Use of RKI funds, in the form of payments or gifts and hospitality for any unlawful, unethical or improper purpose.

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5.1.3 For Quality & Production People :

Applicable to : Quality control, Supervisor, Department heads, Operators, Helpers etc.,

1. Shouldn't get or accept gift / cash etc., from any supplier in order to make them benefit for the following.

- > Accepting inferior product.
- > Issuing gauge/instrument etc., without proper correspondence.
- > To enroll disqualified Supplier in Approved list.
- > Sharing Product /process / Standard / Specification / drawing information to any Supplier/Customer without proper approval from Department's head.
- > Involving in Theft activities like carrying company's information, product, scrap etc., outside the company campus without approval from relevant department's head. Involving colleagues /

2. Involving colleagues / Supervisor / Security for theft assistance.

3. Supporting theft activities or hiding from Top management / Department head without sharing any theft / illegal activity performed by colleagues / Supervisor / department head etc.,

5.1.4 For Logistics People (Driver & Assistant) :

1. Shouldn't get or accept gift / cash etc., from any supplier in order to make them benefit for the following.

- > Carrying less / no quantity of job than quantity mentioned in supplier's delivery challan.
- > Selling job / Raw material / Crate etc to outside party.
- > Carrying job/Crate/Raw material / Scrap without Rkl's delivery challan / Invoice / Gate Pass.
- > Going for outside load without Top management approval.
- > Claiming for false vehicle service with or without bill.
- > Demanding conveyance from supplier for Loading and unloading raw material / job or for accepting Extra load.
- > Making fault entries in Trip sheet.

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5.1.5 For Supplier(s) & Sub-Supplier(s) :

1. Shouldn't offer gift / cash etc., as a complement to any employee of RKI irrespective of him / her designation to make him / her for supplier or sub-supplier benefit for the following.

- > To Leak out companies secrets / standard / Specification / Drawing / Process parameters / Product process etc.,
- > Motivating to give tool / instrument / gauges / any asset without RKI knowledge.
- > Making deal with RKI logistic to do unaccounted transit.
- > To agree Quotation for High price.
- > To accept inferior product.
- > To accept bill without job supply.
- > To do fault accounting of Material reconciliation to avoid penalty.
- > Asking RKI's Setters / operator to do setting in their facility.

6.0 The offences and penalties:

The four offences under the Bribery Act are:

A general offence covering offering, promising or giving a bribe.

A general offence covering requesting, agreeing to receive or accepting a bribe. A distinct offence of bribing a foreign public official to obtain or retain business. Failure to prevent bribery by those acting on their behalf.

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6.1 Penalties :

6.1.1 For RKI Employee :

➤Memo will be issued to the relevant Employee regarding the bribes.

Immediate Termination once offence proved.

➤The outstanding salary of him / her will not be paid.

➤In case, if the loss to company is more than a Lakh, Legal action on him /her will be taken.

➤He / Her will not get Experience / Salary / Conduct / Bonafide certificate from RKI.

However, Managing Partners decision will be final regarding Punishment level like job termination or taking Legal action or Leaving just by warning.

6.1.2 For RKI's Supplier, Sub-supplier & Logistics:

➤Formally informed about the bribe to the top management of that organisation.

➤Relevant supplier or sub-supplier will be terminated from the approved supplier list once the bribe is proved.

To compensate the loss to RKI, that suppliers outstanding payment will be blocked to recover the loss.

If the loss exceeds the outstanding payment of that supplier, than legal notice will be send to that supplier.

Logistic services will be terminated , in case of External agency (or) as said above if it is a RKI's Driver/Employee.

However, Managing Partners decision will be final regarding Punishment level like supplier termination or taking Legal action or Leaving just by warning.



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7.0 Wide interpretation

Failing to prevent a bribe is widely interpreted. RKI is responsible for, and guilty of, an offence if a person associated with RKI bribes another person, intending to obtain or retain business or a business advantage for RKI. An associated person may include, for example, any employee, any supplier, any sub-supplier, logistics.

8.0 RKI defense to failure to prevent bribery offence

RKI will be able to defend itself against the offence of failure to prevent bribery where it is able to show it has “adequate procedures” in place ensuring that those who act for RKI are fully aware that bribery is not acceptable. These adequate procedures include the implementation of an appropriate anti bribery policy which is why this policy is so important for RKI.

9.0 Individual day to day guidance

The following guidance is provided to assist in preventing bribery and corruption but does not replace the clear and careful review of each scenario by each individual to ensure that on each occasion that everyone acts to prevent bribery and or corruption.

- > It is each individual’s responsibility to ensure and follow this procedure and policy.
- > Compliance with this Anti-Bribery and Anti- Corruption Policy;
- > Adherence to RKI values of openness and honesty;
- > Compliance with RKI requirements concerning any conflicts of interest;
- > That all activities and transactions are accurately, completely and transparently recorded;
- > That all appropriate due diligence and risk mitigation procedures are followed before proceeding with any contract or other arrangement;
- > That any suspected or actual breaches of this policy are accurately and promptly reported to their line manager or Compliance Officer;



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10.0 Training

RKI will provide training to ensure that those who are potentially exposed to the risks are aware of these risks and act appropriately. The responsibility of ensuring that relevant training is received lies with all employees and with their line managers.

Training will be organised by The Human Resources Department. A separate register will be retained by the Human Resources Department detailing the date when training was given.

11.0 Communication of policy and internal communications

This policy will be publicly available on the RKI website. Communications will be made to staff when it is reviewed.

This policy is fully supported by Managing Partners who will ensure effective cross communication between departments, Suppliers, Sub suppliers, so that there are no "silos" in relation to potential bribery or corruption.

12.0 Compliance Officer

A Compliance Officer who is a Plant Manager of the RKI will set up and manage and maintain the Notification Memo which will be a permanent confidential record of all reports of suspicious activities. The Notification Memo will be kept securely by the plant manager.

The Notification Memo, Donations Register and the Gifts and Hospitality will each be audited for the purposes of this policy on an annual basis by the Compliance Officer and a report made on these registers to the Audit and Risk Committee.

13.0 Changes to policy

RKI reserves the right to modify or add to this policy at any time. Any material changes will be considered, reviewed and communicated appropriately.

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