

POLICY MEMORANDUM NO: HOEC / CSDP / 2023



ANTI-BRIBERY & ANTI-CORRUPTION POLICY

Purpose: It is HOEC's policy to conduct all of its business in an honest and ethical manner. HOEC takes a zero-tolerance approach to bribery and corruption and is committed to act professionally, fairly and with integrity in all its business dealings and relationships. This policy outlines our zero-tolerance approach towards bribery and corruption, both within the organization and in our interactions with external parties.

Compliance: All employees, contractors, and representatives of HOEC must comply with all anti-bribery and anti-corruption laws and regulations applicable in the jurisdictions where we operate.

Prohibited Activities:

- **Bribery:** Offering, giving, receiving, or soliciting any bribe, whether cash or other inducement, to or from any individual or company, government or private, wherever located.
- **Corruption:** Engaging in any form of corruption, including extortion, embezzlement, abuse of power, or any other illegal or unethical behavior.
- Facilitation Payments: Making or accepting facilitation payments to expedite routine governmental actions.

Reporting Suspected Violations: Employees are encouraged to report any suspected violations of this policy, including concerns about bribery and corruption, to their supervisors, the HR department, or an anonymous whistleblower hotline provided by the organization.

Consequences: Violations of this policy will result in disciplinary action, which may include termination of employment. HOEC may also report violations to relevant law enforcement authorities.

Hindustan Oil Exploration Company Limited is committed to promoting ethical conduct, transparency, and accountability in all its business dealings.