

	Sheetal Metals	Document NO	SM/MGMT/ABEWB/PLCY/09
	Anti-bribery policy including Escalation through whistle-blowing policy	Original Date	01.01.2026
		Revision No	00
		Revision Date :	

OVERVIEW:

At Company Sheetal Metals we require that all of our employees conduct themselves according to the highest standards of ethics, integrity, and behavior when dealing with our clients, colleagues and other stakeholders. This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of law.

This Code establishes the standards of behavior that must be met by all employees. Where these standards are not met, appropriate disciplinary action will be taken. In cases where the breach involves serious misconduct, this may result in summary dismissal. In cases where a breach of the policy involves a breach of any law, then the relevant government authorities or the police may be notified.

Purpose:

The purpose of this policy is to make it clear what the Company expects from employees, and employees are required to be familiar with and comply with the terms of this policy at all times. Failure to do so may result in disciplinary action, including potentially termination of employment.

The Company may unilaterally introduce, vary, remove or replace this policy at any time.

STANDARDS OF CONDUCT:

The standards expected of employees include:

- Compliance with all Company and workplace policies, procedures, rules, regulations and contracts;
- Compliance with all laws; Compliance with all reasonable and lawful instructions given by or on behalf of the Company;
- Devotion of the employee's entire time, attention and skill during normal working hours and at other times as reasonably necessary for the employee to perform their duties;
- To be honest and fair in dealings with customers, clients, co-workers, Company management and the general public, and to treat them with courtesy and respect;
- To be faithful and diligent, and actively pursue the Company's best interests at all times;
- To work in a safe and compliant manner, and to observe all workplace health and safety rules and responsibilities;
- Refraining from any discriminatory, bullying or harassing behavior toward customers, clients, co-workers, Company management and the general public;

Prepared By- Miss. Deepti Thakur
HR Executive

Approved By- Mr. Himanshu Mehta
Director

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- To not make any statements to the media about the Company's business, unless expressly authorized to do so by the Company (requests for media statements should be referred to Insert Media Position);
- To not make any statements about the Company on social media, or any other public platform, that may harm the Company's reputation;
- To not, in connection with the employee's employment, accept any financial or other benefit from any entity other than the Company – unless acceptance of such benefit is in accordance with the Company's policies or is otherwise disclosed to the Company and expressly permitted by the Company;
- To not engage in any employment or provide any services to any person or entity other than the Company, except with the Company's prior written consent;
- To not engage in any employment or provide any services to a supplier or competitor of the Company, except with the Company's prior written consent;
- Immediately disclosing any potential, perceived or actual conflict of interest (whether direct or indirect) that may give rise to a conflict with the performance of the employee's obligations to the Company, or the Company's business, confidential information or reputational interests. The Company may direct employees to take action to eliminate or reduce any such conflict, and employees must comply with such directions;
- To not engage in conduct, whether during or after work hours, that in the opinion of the Company causes damage or potential damage to the Company's property or reputation;
- To not use, or come to work while affected by use of prohibited drugs or alcohol;
- To not discriminate on the basis of personal characteristics including (but not limited to) sex, race, disability, pregnancy, age, marital status or sexual orientation;
- To ensure and maintain punctuality; To respect the Company's property;
- To dress in an appropriate manner and to ensure that appearance is presentable, clean, neat and tidy (including but not limited to wearing any uniform that is required of you by the Company);
- To not use Company internet to access and/or download sexually explicit material or other offensive

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material;

- To not use Company email to send sexually explicit or suggestive material, or other offensive or harassing material;
- To maintain both during employment and after termination of employment with the Company, the confidentiality of any confidential information, records or other materials acquired during the course of employment;
- At all times, behave in a way that upholds the Company's core values and the integrity and good reputation of the Company;
- Reporting any conduct of other workplace participants which is in breach of any of the above, or potentially in breach of any of the above, without delay.
- We are strict for any type of bribery, if any employee, Stakeholders or any associate found involved in the same then follow the process given below.

What is a bribe?

A bribe is anything of value that may be seen as an attempt to influence an action or a decision in order to obtain or retain business or acquire an improper advantage. This could include money, gifts, favors, use of company resources, entertainment or other items of value.

We should never offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official, commercial partners including customers or their representatives to:

- Obtain or retain business;
- Influence business decisions; or
- Secure an unfair advantage

If we receive any type of bribe or commissions or unethical work or any harassment against woman or any intentional violation of the Company or Misbehavior with anyone, such type of cases whistle blower is free to escalate on email ID and Contact below.

Mr. Himanshu (Director)

Email ID himanshu@sheetalmetals.com s

Mobile Number- 9425919122

We will not disclose the name of the whistle blower, the escalations would be reviewed with Mr. Himanshu Mehta

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(Director) Key person of the Company.

Based on the review, we will appoint independent and unbiased investigation team.

Based on the investigation reports and evidence

If the issue which is related/affected, Government regulations, woman harassment, circulate the confidential document/information with others, misuse of company properties /theft from company or violation of nay above rules.

will be terminated without, any prior notice. If required, we will make sure legal action.

It at any point of time it has been observed and proved that an employee is violating the code of conduct a strict disciplinary action will be taken. This action may lead to the termination of the services without any explanation.

In case of improper behavior with anyone of the employee or team members, intentionally

Affect production, sale, quality, machines, company property, assets will be suspended for one month without prior information

By Order:

Director
Sheetal Metals



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Reference documents

S. No	Title of the Documents	Documents Number

Amendment History

S.No	Revision Date	Reason of Change	Revision Number

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