

RAYCHEM-RPG PRIVATE LIMITED
Government Officials Interaction Policy

GOVERNMENT OFFICIALS' INTERACTION POLICY

RRPL_CPP_Government Officials' Interaction Policy

Effective Date: April 19, 2024

POLICY STATEMENT AND PURPOSE

Raychem RPG Private Limited (“**Raychem RPG**” or “**Company**”) upholds the belief that fostering a proactive, honest, transparent, responsible, and sustainable dialogue between Government Officials and the Private Sector, is a cornerstone of effective public governance.

Recognizing the significance of professional engagement and dialogue with Government Officials, we consider it essential to facilitate the adoption of policies that optimize the marketplace, ensuring the realization of the most favorable solutions for business. Committed to a constructive and transparent dialogue, we aim to address pertinent business issues in collaboration with Government Officials.

In the course of their work, whether domestically or internationally, Raychem RPG officers, employees (*both on-roll and off-roll*), consultants, advisors (*or consultants' /advisors' employees or any person where applicable representing the Company*), directors (collectively referred to as “**Representatives**”) may engage with Government Officials, who must be treated on par with the employees of the Company. Non-compliance with laws and regulations in such interactions can lead to significant penalties. Accordingly, Raychem RPG emphasizes that it is imperative for its Representatives to consistently uphold the highest levels of professionalism and integrity when dealing with Government Officials, recognizing the potential repercussions of such relationships on the Company.

Raychem RPG is dedicated to honesty and accuracy in all reports, statements, certifications, tenders, proposals, and claims submitted to government agencies. The Company firmly opposes corruption and any attempts to gain an undue advantage that may influence Government Officials.

SCOPE AND APPLICABLE POLICIES

This Policy applies to all Raychem RPG Representatives. All Representatives are expected to read and abide by this Policy relating to interactions with Government Officials, along with other related policies:

 [RRPL_CPP_ABAC Policy.pdf](#)

DEFINITIONS

- i. “**Applicable Laws**” refer to all laws, ordinances, constitutions, regulations, status, treaties, rules, codes, etc., applicable across all jurisdictions in which Raychem RPG conducts business operations.
- ii. “**Government Official(s)**” includes, but is not limited to any of the following:
 - Individuals employed by government departments or agencies on the local, national, and international levels for the execution of public administration
 - Individuals employed by a company or business fully or partially owned by a government or government agency

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- Any judge or presiding officer of a court or statutory forum, including any person empowered by law to discharge any adjudicatory function
 - Any person authorized by a court of law to perform any duty in connection with the administration of justice
 - Members of political parties and candidates for political offices
 - Any other person defined as a “public servant” under the Prevention of Corruption Act, 1988, or the Lokpal and Lokayuktas Act, 2013 or other Applicable Laws.
- iii. **“Facilitation Payments”** or “grease payments”, refer to any payment made to a Government Official to speed up a process pertinent to Raychem RPG’s business.
- iv. **“Kickbacks”** refer to an illegal payment intended as compensation for preferential treatment or any other type of improper services received.

“Relative” of an employee or a director or any other person for the purpose of this policy deemed to be a relative of another, if (a) they are members of a Hindu undivided family; or (b) they are husband and wife; or (c) the one is related to the other in the manner as 1. father; 2. mother (*including step-mother*); 3. son (*including step-son*); 4. daughter (*including step-daughter*); 5. son's wife; 6. daughter's husband; 7. paternal and maternal grandparents; 8. grandchildren; 9. spouses of grandchildren; 10. siblings (*including step-brother & sister*) and their spouses; 11. brother and sister of either parents and their spouses; 12. cousins and their spouses (*i.e. children (& their spouses) of brother and sister of either parents*).

GUIDELINES FOR INTERACTIONS WITH GOVERNMENT OFFICIALS

- i. The Company engages with Government Officials (*including the officers of public utilities or government companies*) with respect to supply of its products and services; thus wherever any engagement is with any Government Official or officials of these public utilities or government companies, in their capacity as customers of the Company, such officers shall be treated at par with any other customers of the Company and any dealing shall be in normal course of business requiring no special approvals, though any gift and hospitality shall be in strict compliance with the Anti-bribery and Anti-Corruption Policy (**“ABAC Policy”**) covering the Company’s policy on gifts and hospitality. All the other guidelines in this Policy shall be adhered to.
- ¹Whereas, **“Government company”** means any company in which not less than fifty-one per cent of the paid-up share capital is held by the Central Government, or by any State Government or Governments, or partly by the Central Government and partly by one or more State Governments and includes a company which is a subsidiary company of such a government company. (*Explanation, For the purposes of this clause, the “paid-up share capital” shall be construed as “total voting power”, where shares with differential voting rights have been issued.*)
- ii. Only authorized Representatives of the Company shall represent the Company when interacting with Government Officials, authorized by the concerned functional head.
- iii. The Company prohibits the authorization of employees' Relatives to represent the Company before Government Officials. Additionally, authorized Representatives are not permitted to meet with relatives of Government Officials on behalf of the Company with the aim of gaining access to Government Officials.
- iv. Representatives engaging with Government Officials must adhere to Applicable Laws, exercise sound judgment, and comply with Raychem RPG’s Code of Corporate Governance and Ethics (**“CCEG”**), Anti-Bribery and Anti-Corruption Policy (**“ABAC Policy”**), and other pertinent Raychem RPG policies [PDF RRPL_CPP_ABAC Policy.pdf](#).

¹ This revision is effective from October 1, 2025

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- v. Representatives engaging with Government Officials are obligated to uphold integrity, honesty, and transparency. They must openly communicate the purpose of the interaction, their identity, and their relationship with the Company. They shall not misrepresent their status or the nature of their inquiries to Government Officials or create a false impression thereof.
- vi. Institutional and government relational activities must be conducted impartially and independently. The primary focus should be on exclusively advancing the legitimate interests of the Company.
- vii. Any unethical demand from Government Officials shall be reported to the functional manager and the CCO.
- viii. For all interactions with Government Officials, the following criteria shall be met:
 - Only authorized Representatives are allowed to meet with Government Officials. The authorized Representative must possess comprehensive knowledge of Raychem RPG's business and of the specific topic to be discussed with the Government Official.
 - Meetings to the extent feasible should be conducted within business hours, preferably on the premises of the Company or the Official's office, and not in isolated settings.
- ix. All interactions with Government Officials should adhere to the following communication guidelines:
 - a. Official communication with Government Officials is to be conducted exclusively by authorized personnel using official channels, such as official telephones, corporate emails, and corporate letterheads.
 - b. Communication should not occur through social media platforms, including LinkedIn, Facebook, etc.
- x. When in doubt, speak to your reporting manager or the legal team.

PROHIBITIONS IN INTERACTIONS

In interactions with Government Officials, the following activities are strictly prohibited:

- i. Promising, offering, making, authorizing, transferring, providing, delivering, or accepting (*directly, indirectly or through Representatives*) payments, gifts, travel, entertainment, lodging, donations, concessions, or any other undue advantages of any kind.
- ii. Obstructing inspections by hiding, segregating, or manipulating the required information within the scope of inspections, visits, or oversight.
- iii. Authorizing, offering, promising, or providing Kickbacks or Facilitation Payments.
- iv. Making contributions in cash, goods, or services to campaigns or political causes, public entities, social organizations, or institutions and bodies financed through public funds.
- v. Attempting to exert undue influence over a Government Official with the aim of acquiring or maintaining business interests or gaining a competitive advantage in the business realm.

EXEMPTIONS IN GIFTS AND EXPENSES MADE TO GOVERNMENT OFFICIALS

Any gift to a government officer or any officer of a statutory body or a quasi-statutory body is generally not encouraged, however, if a gift during any occasion is to be given to any such official, it shall be with approval as per the Anti-bribery and Anti-corruption Policy of the Company and within the financial threshold therein. ^{1 above} No gifts to any government official is allowed if it is contrary to this Policy or a Country's public policy or concerned ministry/department guidelines to which such an officer serves or any applicable law to Raychem RPG and/or such government official. In no event any gift (*even of insignificant value*) can be provided to the US Government Officials. ^{1 above}

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Reasonable expenses during the interactions or engagement with Government Officials viz. meals, entertainment, transportation, accommodation, travel, lodging boarding and other similar expenses as per the event, may be incurred within the limits and categories specified for the travel and entertainment policy for employees, and any deviation whereof shall be approved by the Chief Human Resource Officer of the Company (“CHRO”) and the Chief Compliance Officer (“CCO”) shall be copied.

All expenses made towards gifts, hospitality, travel, or lodging must be duly recorded in the database maintained for dealings with the Government Officials along with details of approvals as above.

In no event any gift (*even of insignificant value*) can be provided to US Government Officials.

Authorized employees/Representatives are expected to be well-versed with the ABAC Policy.

APPROVAL PROCESS

The following business interactions with Government Officials necessitate prior approval of the line manager and the concerned functional head:

- i. Scheduled meetings on behalf of the Company
- ii. Gifts, hospitality, and necessary travel and lodging expenses
- iii. Any other necessary interactions essential to the course of business

To seek approval for the aforementioned interactions, adhere to the following process:

- i. Complete the Government Official(s) interactions form as provided in this Policy.
- ii. Forward the requisition to the line manager, while also copying the functional head.

EMPLOYMENT OF FORMER GOVERNMENT OFFICIAL

In the event that Raychem RPG considers hiring a former Government Official, such official should ensure and confirm to the Company that their appointment shall not be in conflict with rules, regulations or departmental/regulatory guidelines applicable to them in terms of their appointment with the Company viz. conflict of interest with the office held and the appointment or the cooling off period required etc. Also, the Company shall ensure that requisite documents and confirmations are sought by the proposed former Government Official to be appointed.

CONFLICT OF INTERESTS

Representatives authorized to engage with a Government Official, having a pre-existing relationship with said official, or lacking independence for any reason, must promptly disclose their conflict of interest. Additionally, any conflicts of interest that arise during interactions must be duly reported to the Chief Compliance Officer of the Company immediately.

CONFIDENTIALITY

During any interaction with Government Officials, Representatives are prohibited from disclosing any confidential information provided to them in the course of their activities for Raychem RPG, subject to Applicable Laws.

IMPLEMENTATION

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Raychem RPG Representatives bear direct responsibility for upholding the integrity of the business. All relevant parties must be duly informed and made aware of this Policy by the compliance department regularly and the concerned functional head while dealing with such interaction required.

REPORT AND VIOLATIONS

Any breach of this Policy is strictly prohibited and may result in appropriate actions, including an internal investigation, with potential consequences up to and including termination. Prompt reporting of any violations under this Policy is strongly encouraged and can be made to the Chief Compliance Officer of the Company at legal_compliance@raychemrpg.com Individuals reporting such violations will be protected under the  [RRPL_CPP_Redressal Mechanism.pdf](#) /  [RRPL_Whistle Blower Policy.pdf](#)

Publication History:

Original Issue Date: April 19, 2024

Prepared By	Approved by	Approval Date	Issuance Date
Suchi Agarwal	Compliance Committee of Partners (Members: Rajat Bhargava, Pramod Menon, Henno Groell, Viswanath S)	April 19, 2024	April 19, 2024
Revision 1 Revision under heading: EXEMPTIONS IN GIFTS AND EXPENSES MADE TO GOVERNMENT OFFICIALS” and definition of Government Company under heading “GUIDELINES FOR INTERACTIONS WITH GOVERNMENT OFFICIAL”			
Suchi Agarwal	Compliance Committee of Partners (Members: Rajat Bhargava, Pramod Menon, Henno Groell, Viswanath S)	September 15, 2025	Effective: October 1, 2025

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DECLARATION

I, the undersigned do hereby certify that,

1. I have read and understood the Interactions with Government Officials Policy of Raychem-RPG Private Limited ("**Company**").
2. I also affirm to comply and abide with the requirements of the Policy, during my employment and/or my interaction with the Government Officials for Company's work.
3. I will not engage in, nor attempt to engage in any acts violative of the Policy while discharging my duties for or on behalf of the Company or in any personal capacity during the term of my employment with the Company.
4. In case I come across any instances of non-compliance with the Policy, I shall promptly highlight such non-compliance to the relevant authorities in the Company.

Employee Name

Employee ID

Designation

Department

Date

Signature