

RAYCHEM-RPG PRIVATE LIMITED
Compliance In Tenders Policy

COMPLIANCE IN TENDERS POLICY

RRPL_CPP_Compliance in Tenders Policy

Effective Date: April 1, 2024

POLICY STATEMENT AND PURPOSE

Raychem RPG Private Limited (“**Raychem RPG**” or “**Company**”) strives to be accountable, fair, and transparent at all stages of the tender process. This policy on Compliance in Tenders (“**Policy**”) has been instituted to effectively streamline the processes and strategies to ensure that the Bids secured by Raychem RPG are the result of ethical and profitable decision-making and sound risk management. This Policy reinforces Raychem RPG’s commitment to continuous and performance-driven improvement and benchmarking.

Moreover, Raychem RPG is committed to aligning itself with the spirit and guidelines outlined in the General Financial Rules 2017 (“**GFR 2017**”) issued by the Government of India or any other law that is applicable to the Company.

SCOPE AND APPLICABLE POLICIES

This Policy applies to all Raychem RPG employees (both on-roll and off-roll), managers, directors, contractors, service providers, consultants, and officers as well as any Agent(s) for Raychem RPG. Compliance in tender implies careful consideration at all stages of the Tender process by every person involved. Non-adherence to any of the principles and regulations of this Policy by the parties responsible for carrying out the functions would attract disciplinary actions under RPG's Code of Corporate Governance and Ethics (“**CCGE**”) read with the Company's disciplinary policies and procedures.

DEFINITIONS

- a. “**Agent**” refers to a person appointed by Raychem RPG to do any act for or represent Raychem RPG as a representative participating in the Tender processes for and on behalf of it.
- b. “**Bid**” or “**Tender**” or “**Procurement**” or “**Offer**” or “**Quotation**” in specific contexts, means an offer to supply goods, services, or execution of works made as per the terms and conditions set out in the Government’s official document inviting such offers.
- c. “**Government**” means the Indian Central Government or a State Government as the case may be and includes agencies and Public Sector Enterprises under it, in specific contexts;
- d. “**Risk Profiling**” with regard to Tenders refers to the process of identifying potential risks/implications that a Tender may have on the Company.

GUIDELINES WHILE BIDDING FOR PUBLIC TENDERS

- In the context of public Tenders, GFR 2017 & applicable laws shall be adhered to, wherever applicable. Bidding must strictly comply with the stipulations outlined in these regulations, emphasizing financial propriety and the procurement .
- Raychem RPG is dedicated to upholding honesty and unwavering transparency throughout the process of bidding for public Tenders.
- Any endeavor to manipulate the procurement process will be rigorously addressed in accordance with the CCEG, as well as other pertinent policies.

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- Raychem RPG prohibits bribery and corrupt practices throughout the Tender process. Employees are strictly forbidden from engaging in any activities involving the offering, giving, or acceptance of bribes, kickbacks, or any other forms of corrupt inducements to influence Government officials in order to secure the Tender. All employees dealing with the tendering process must be compliant with the Anti-Bribery and Anti-Corruption (ABAC) Policy (linked here [PDF RRPL_CPP_ABAC Policy.pdf](#)).
- Raychem RPG is dedicated to upholding absolute transparency in its pursuit of public Tenders. The Company pledges to furnish requisite information without resorting to manipulation of documents, accounts, or prior experience.
- Employees engaged in the tendering process will undergo consistent training to stay abreast of compliance requirements.
- If Raychem RPG successfully secures a public Tender, the Company will be held publicly accountable for its financial responsibilities.
- Employees involved in the tendering process must disclose any potential conflicts of interest promptly. Any situation that may compromise objectivity, fairness, or impartiality in the tendering process must be reported and resolved appropriately.

GUIDELINES IN TENDERING PROCEDURES

Upon obtaining the necessary approvals to commence the tendering process, strict adherence to the following procedures is mandated:

- Authorized employees should prepare the Tender documentation/quotation and provide all required information to facilitate the tendering process.
- A comprehensive review must be conducted to ensure compliance with all applicable laws, regulations and organizational policies.
- Verify the documents to be submitted meticulously, exercising caution to ensure their strict adherence to GFR 2017 and other pertinent guidelines.
- Prior to submitting the Tender, relevant internal teams shall do comprehensive Risk Profiling. This will provide insights into the potential implications of the Tender on the Company.

RISK PROFILING

Prior to submitting a Tender, the internal teams (*e.g. sales, product management, quality, finance, legal or any other relevant team, as the case may be*) are required to conduct a thorough Risk Profiling to assess the potential risks and implications that the Tender may pose to the Company. This profiling encompasses the following aspects:

- i. Technical Risk Profiling – to assess the Company's capability to meet the requirements outlined in the Tender and ensure successful project completion.
- ii. Financial Risk Profiling – to evaluate the Company's capacity to successfully execute the project within allocated and budgeted financial resources.

DOCUMENTATION AND RECORD-KEEPING

The records of tendering process including Bid evaluations, decisions, and communications records etc. should be maintained in accordance with the Company's record-maintenance policies.

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CONFIDENTIALITY

Information related to Tenders, including bidder details and pricing, must be treated with confidentiality. Unauthorized disclosure of sensitive information is strictly prohibited.

APPROVALS

Prior to initiating the application for a public Tender, the delegation of authority matrix should be confirmed and where required approval from the appropriate officer/committee as nominated by the Board of Directors of the Company/ Board of Directors shall be obtained.

REPORTING 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 is strongly encouraged under this Policy. The reporting can be made as per the Redressal Mechanism at legal_compliance@raychemrpg.com or as per the Whistle Blower Policy of the Company. Individuals reporting such violations will be protected under the Redressal Mechanism ([PDF RRPL_CPP_Redressal Mechanism.pdf](#)) / Whistle Blower Policy ([PDF RRPL_Whistle Blower Policy.pdf](#)) of the Company.

Publication History:

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Prepared By	Approved by	Approval Date	Issuance Date
Suchi Agarwal	Compliance Committee of Partners (Members: Rajat Bhargava, Pramod Menon, Henno Groell, Viswanath S)	March 28, 2024	April 1, 2024

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DECLARATION

I, the undersigned do hereby certify that,

1. I have read and understood the Compliance in Tenders Policy of Raychem-RPG Private Limited (“**Company**”).
2. I affirm to comply and abide with the requirements of the Policy, during my employment and/or engagement, in any capacity, with the Company.
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 or violation of any of the provisions of the Policy, I shall promptly highlight such non-compliance or violation to the relevant authorities in the Company.

Employee Name

Employee ID

Designation

Department

Date

Signature