



TEAMLEASESERVICES LIMITED

ANTI BRIBERY AND CORRUPTION POLICY



VERSION CONTROL:

VERSION	AUTHOR	REVIEWER	APPROVER	DATE OF BOARD APPROVAL	NOTES
1.0	Alaka Chanda	Ravi Vishwanath	Board of Directors	July 26, 2019	First version of the document

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1. Objective

This Anti-Bribery and Corruption Policy sets out the efforts of TeamLease Services Limited (referred to as 'TeamLease/Company/Organisation) in mitigating bribery and corruption. The Anti-Bribery and Corruption Policy is governed by a set of principles and series of procedures. The objective of the policy is to emphasize TeamLease's 'Zero Tolerance' approach towards bribery and corruption.

2. Scope

The scope of this Anti-Bribery and Corruption Policy extends to TeamLease and all its related subsidiaries and related entities.

3. Principles

TeamLease as a part of fair practices do not pay and accept bribes, either directly or via third parties, in any manner or circumstances. Any violation or breach to this principle by an employee will be viewed seriously and treated as an act of gross misconduct.

4. Practical Procedures

a. Training

Compulsory training will be provided to all employees during induction in ensuring their awareness of this Anti-Bribery and Corruption Policy, relevant legislation and their obligations under this Anti-Bribery and Corruption Policy including the code of conduct set as part of their employment.

b. Review

TeamLease will monitor, review and annually report the effectiveness of this Anti-Bribery and Corruption Policy. The report will be submitted annually for approval to the Board of Directors.

c. Internal Record Keeping

TeamLease will ensure safe record-keeping of such reviews and timely submission of such reports of such reviews to the senior management.

d. Communication

The Principles and Practical Procedures of this Anti-Bribery and Corruption Policy will be communicated effectively through employee handbook, induction and the corporate website. The provisions of this Anti-Bribery and Corruption Policy are also effectively communicated to all TeamLease vendors through written communication and clear statement on TeamLease Corporate website.



e. Employee Conduct

Employees are required to report any knowledge / suspicion of receipt or payment of a bribe. Known suppression of knowledge will also be treated as misconduct.

f. Whistleblowing

TeamLease regards reporting of any instance of bribery or attempted bribery as a responsible 'whistleblowing' and affirms that such employees do not suffer work place harassment, bullying, demotion, penalty, or other adverse consequences.

All disclosures by the whistle blower must be addressed to the respective authorities as per the details documented in the organization's Whistle-Blower and Vigil Mechanism Policy.

All such whistle blowing cases pertaining to bribery and corruption would be attended by the organisation in the same manner as documented in the organization's Whistle-Blower and Vigil Mechanism Policy

Employees may refer to the following link on the company website for the above said Policy:

https://www.teamleasegroup.com/sites/default/files/Vigil%20Mechanisim%20Policy_0.pdf

g. Contractors and Vendors

TeamLease requires screening procedures to be carried out on those of its agents, advisers, contractors, intermediaries, and other representatives who supply material goods and services to TeamLease to protect TeamLease from reputational risk of being associated with illegal or corrupt payments.

TeamLease requires all its Associates, Contractors and Vendors are made aware of its Anti-Bribery Principles and Practical Procedures and they reaffirm faith that they do not indulge in any act which is in violation of this Anti-Bribery and Corruption Policy

5. Reporting

The report and accounts of TeamLease, for the Annual General Meeting will include a report on the working and effectiveness of this policy (including the number of reports of bribery and corruption recorded and a short summary of any investigations on them).

6. Remedies & Discipline

If the Organisation determines that a case of bribery or corruption has occurred, it will take the following action to correct it.



- Any person found guilty of violation of the TeamLease Anti-Bribery and Corruption Policy, will be subject to disciplinary action up to and including termination of employment.
- Appropriate procedures, policies and controls will be established in all departments to ensure early detection of similar violation.
- During the investigation period or at any time thereafter, if any employee is found to be
 - a. retaliating against the complainant,
 - b. coaching witnesses or
 - c. tampering with evidence, then it would lead to severe disciplinary action including termination of employment.

7. Exceptions

Any exception to the Anti-Bribery and Corruption Policy must receive the prior written approval of the Group Managing Director.

8. Disclaimer

TeamLease will not be liable and shall not hold any responsibility for any acts of omissions that the participants (Employees, Contractors and/or Vendors) under this policy may commit in their personal capacity.

9. Effective Date

This is with effect from July 26, 2019.

10. Amendment

Any change in this Policy shall be approved by the Board of Directors of the Company. The Board of Directors shall have the right to withdraw and / or amend any part of this Policy or the entire Policy, at any time, as it deems fit, or from time to time, and the decision of the Board in this respect shall be final and binding.
