



The Phoenix Mills Limited (PML)



Communication and Training Policy



1. Introduction

The Phoenix Mills Limited (“PML” or “the Company or “our” or “we” or “us”) has zero tolerance approach towards bribery and corruption.

PML training program teaches employees and business partners about applicable anti-corruption legislation and provides guidance on how to identify and deal with ethics and corruption issues that they may encounter. Through communication of PML zero tolerance policy on corruption, the program seeks to reduce the risk that employee will engage in corrupt behaviour.

PML is committed to ensure that through periodic training and communications its employees¹ and business partners² are aware about various applicable anti-corruption legislations, Company’s policies and potential threat associated with these legislations.

2. Purpose and Objective

The objective of this policy is to improve communications by providing a framework and access to specific information, which will help in communication of its Code of Conduct Anti-Bribery and Corruption policies across the organization and its associated third parties and staff.

It is the responsibility of Compliance Officer³/ GM Legal / Centre Director / Human Resources department to provide relevant information /arrange for imparting of these trainings to its employees and business partners.

The policy is intended to ensure that relevant trainings are ongoing, regularly updated and have an ability to monitor the successful delivery to employees and business associates.

3. Applicability

This policy is applicable to:

¹ ‘Employee’ is an individual who works for the Company either on full time or part time basis and is bounded by the ‘contract of employment’, terms of which are either expressed or implied.

² Business partner is any individual, group of individual or entity which includes consultants, lawyers, third parties, suppliers, vendors, agents, whether government owned or managed, associated with the firm for business.

³ The Compliance Officer is responsible for overseeing, designing, managing and monitoring the Compliance framework of the Company and ensure the Company complies with all applicable regulatory requirements and internal policies of the Company.

1. All Employees⁴ including temporary or off roll employees of PML;
2. All Directors of the PML; and
3. All business partners (i.e. vendors, suppliers, agents, consultants, advisors and other third party intermediaries that do, or will, or may at some time in the future; interact with public or government officials on behalf of the Company).

4. General Guidelines

The general guidelines for training and communication are given below:

- Providing good quality and standard online training module on anti-bribery and corruption;
- Trainings provided should have some clearly defined steps for ABC situations;
- Enhanced and additional safeguards communicated to employees in higher-risk positions;
- Contents of the online training module should be regularly updated to reflect any changes in applicable ABC laws;
- Ensure training covers practical examples of risk and how to comply with policies;
- List of the employees who have completed online training module to be maintained by the Compliance Officer/GM Legal/ Centre Director and Human Resource team for records; and
- Notifications should be provided to employees regarding the upcoming ABC trainings.

5. Communication and Training for Employees:

5.1. Training

Training for new hire

All the new hires of the Company irrespective of the joining designation should be clearly communicated the zero tolerance approach of the Company towards bribery and corruption.

They should be guided as to how to access Company's policy documents (including ABC policy).

⁴ Employee is an individual who works for the Company either on full time or part time basis or acts as a consultant or an advisor or Subject Matter Expert for the Company and is bounded by the 'contract of employment', terms of which are either expressed or implied. They include (i) on-roll workers, trainees, articles, apprentices, seconded etc. whether remunerated or not remunerated for the services offered to the Company, (ii) Team of high level executives or executive management i.e. Chief Experience Officers ('CXO's') and key process owners or AGMs and above level of the Company responsible for strategy, management, planning and administration of the Company and (iii) Any individual having decision making, planning and administration authority/ control in a Company

Training for existing employees

- All the employees are required to provide annual affirmations to the Anti-Bribery and Corruption Policy through online training module
- The Compliance Officer/GM Legal/Centre Director/ Human Resources department is responsible for identifying and coordinating the online training module of employees, including employees working in high-risk functions or areas, such as persons working in certain staff functions, including legal and finance; employees with procurement, contracting and marketing responsibilities; employees who regularly interact with Public Officials, such as those responsible for obtaining licenses and permits; and employees working in geographic areas deemed to have a high risk of corruption.

5.2. Communication

A communication program should be developed which provides guidance on internal communications and offer training opportunities. Every employee must complete the online training module on annual basis

6. Communication to Business Partners:

All high risk vendors and Third Party Intermediaries should be made aware (in contract provisions or otherwise) of the Company's zero tolerance policy for bribery and that business carried on with or on behalf of the Company must be compliant