TGV GROUP | SRAAC

TGV SRAAC LIMITED

Gondiparla, Kurnool-518004

POLICY ON ANTI-TRUST / EXPORT CONTROLS & SANCTIONS

(A) Export Controls – Exports

1. **Regulatory Compliance**: Must adhere to all relevant export control regulations, including requirements in other jurisdictions where the business operates. Ex: Include REACH Registration and Import Country restrictions on cargo carriage and packing materials (e.g., specific types of pallets).
2. **Coordination with Compliance**: Should work closely with the Legal or Compliance Department to verify any licensing requirements for cross-border transfers.
3. **Licensing Requirements**: Obtain the necessary export licenses before sharing any controlled information with international clients or partners.
4. **Documentation**: Ensure that all export-related communications and transactions are documented and securely stored.
5. **FERA Compliance**: Adhere to FERA (Foreign Exchange Regulation Act) requirements to maintain compliance.
6. **Credit Risk Assessment:** Conduct thorough credit risk assessments for international clients before initiating any export transaction. Verify the buyer's country risk rating as provided by ECGC, and ensure coverage where necessary.

(B) Sanctions – Exports

1. **Adherence to Sanctions Lists**: Must comply with sanctions lists, including restrictions related to SAARC countries.
2. **Prohibited Marketing Activities**: Refrain from conducting any marketing activities in countries or regions under comprehensive sanctions, such as North Korea, Iran, and Pakistan.
3. **Risk-Based Assessment**: Implement a risk-based approach to assess the potential for sanctions violations. High-risk engagements, especially in regions prone to sanctions concerns, require enhanced due diligence and scrutiny.

(C) Anti-Trust – Exports

1. **Competitor Communications**: Avoid discussions involving pricing, market strategies, or promotional plans with competitors.
2. **Cartel Avoidance**: Ensure that no agreements or collaborations are formed that could lead to cartel formation.
3. **Fair Tender Participation**: Participate fairly in tenders, maintaining transparent and independent practices.

01.12.2024

K.KARUNAKAR RAO
Chief Executive Officer (C.E.O)