



TGV SRAAC LIMITED

Gondiparla, Kurnool-518004

POLICY OF ANTI-TRUST AND FAIR COMPETITION

ANTI-TRUST STATEMENT OF THE ORGANIZATION:

At TGV SRAAC LIMITED, (hereafter referred to as 'TGV SRAAC LIMITED' or 'We' or 'company') our belief in "To empower ourselves with excellence and to thus, grow and reach the pinnacle of market leadership" is anchored to provide products and services of international standards through pioneering innovations, while keeping in sight, our responsibility towards the society we dwell in.

TGV SRAAC LIMITED believes in succeeding in business ventures by dealing with integrity, ethics and without any unfair competitive means, while dealing with suppliers, customers, or competitors.

TGV SRAAC LIMITED aims to out-perform competition fairly and honestly. TGV SRAAC LIMITED prohibits all actions that are anti-competitive or otherwise contrary to applicable competition or antitrust laws.

OBJECTIVES:

- The policy sets out an approach of TGV SRAAC LIMITED to demonstrate zero tolerance towards unfair means of competition not only within the organization, but also in its dealing with suppliers, distributors and other competitors in the market.
- It will not only help to maintain professional decorum while participating in healthy competition, but also guide us to adhere to our integrity in all our business dealings as well as relationships internally and externally.
- The policy will bring more clarity about do's and don'ts by all employees and personnel. Thus, it will bring fair, ethical and transparent conduct within the organization.
- Company Management Representative and Company Secretary shall be responsible for this policy and may conduct/organize any necessary training, if any, for employees for proper implementation and adherence.
- Changes and amendments to the policy shall be made and documented after prior approval of the Company Management Representative and Company Secretary.
- Periodic review and update of the policy may also be undertaken to ensure compliance with evolving legislative landscape and TGV SRAAC LIMITED's business philosophy. This policy will be reviewed at least once a year from the date of release.
- Every TGV SRAAC LIMITED employee & all personnel representing TGV SRAAC LIMITED are expected to adhere to all laws and TGV SRAAC LIMITED's policies, procedures, principles and standards, including this Policy.

APPLICABILITY:

- This policy is applicable to all employees, officers or any person working for TGV SRAAC LIMITED or on its behalf in any capacity at all locations, across the world, including, but not limited to its subsidiaries out of India.



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DEALING WITH COMPETITORS:

Prohibition on anti-competitive arrangements:-

We promote interactions with competitors through trade associations, professional seminars, and any other industry groups as long as they are fair, ethical, and transparent and don't promote any anti-competitive arrangements.

Prohibition on sharing sensitive information:-

TGV SRAAC LIMITED Personnel shall exercise caution at all times while dealing with competitors on any platform and shall not divulge any information or get involved in discussions related to pricing, bid amounts of winning contracts, terms and conditions of sale or any related sensitive information which may promote unfair trade practice and restrict the fair, free and open market.

Ethical sources of information:-

All competitive information and/ or intelligence must only be collected through permitted legal and ethical means such as published news, press releases, and information available in the public domain. Any innovative research effort at TGV SRAAC LIMITED must not be influenced by discussions with competitors.

Restrictive practices:-

Restricting the freedom of competitors by way of price-fixing, customer selection or terms and conditions of sale of products by direct or indirect means are some important elements of competition law that are prohibited under all circumstances.

Any type of agreement or arrangement, written or oral, which adversely impacts fair and open competition, including but not limited to price-fixing, market sharing, resale price, exclusive supply/ distribution, bid-rigging or collusive tenders, boycott other enterprises, arrangement with competitors to influence the price of engagement is prohibited.

MERGERS AND ACQUISITIONS:-

- TGV SRAAC LIMITED encourages acquisition and/or mergers or any similar business arrangements, which create positive synergy like reduction of cost or promote efficiencies and so on.
- TGV SRAAC LIMITED discourages any acquisition of the asset, business or share or any other type of business combination, if such acquisition or merger substantially restrains competition in the market. In all countries, anti-competitive law provides for enforcement and administrative powers to authorities to approve such business arrangements depending on thresholds ranging from revenue, the value of assets, market share and so on.



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- Whether any proposed merger or acquisition will trigger prior approval from local authorities or not will depend on the facts and circumstances of each business arrangement and all personnel of TGV SRAAC LIMITED, must consult the Management and Company Secretary in the early stages of any such business.

REPORTING CHANNELS:-

- ❖ If you are aware of any unfair competition arrangement or if you suspect any unfair competition arrangement has occurred or may occur, then you must notify as per the provision of Whistle Blower & Vigil Mechanism Policy as soon as possible.
- ❖ In case any unauthorized news or information is received from any competitor, then TGV SRAAC LIMITED Personnel must immediately report it to the Head (Legal) and Company Secretary.
- ❖ TGV SRAAC LIMITED hopes that, this policy will enable all TGV SRAAC LIMITED Personnel to voice whistleblowing concerns openly. Completely anonymous disclosures are difficult to investigate. If you wish to raise concern confidentially, then, we will ensure to make every effort to keep your identity a secret and only reveal it, where necessary to those involved in investigating the concern.

COMPLIANCE AND MONITORING:-

- All TGV SRAAC LIMITED Personnel shall ensure adherence to this Policy.
- Any violation of this policy or any other anti-trust laws can carry severe criminal penalties and civil damages for TGV SRAAC LIMITED Personnel and/ or TGV SRAAC LIMITED.
- The company reserves all rights to initiate disciplinary actions up to and including termination of TGV SRAAC LIMITED Personnel involved in the breach.

Date: 01.12.2024


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