

Lobbying and Political Engagement Policy

Introduction:

At Techno Electric & Engineering Co. Ltd. (TEECL), transparency, accountability and integrity are our prime values and the most important assets of our business conduct. We frequently engage with government institutions, regulatory bodies, and public officials in furtherance of our legitimate business objectives. Responsible lobbying practices help the organization to achieve maximal operational efficiency and output, all-round improvement in stakeholder relationships, enhancement in brand value, ultimately leading to future readiness. This policy sets forth TEECL's principles and procedures for engaging in lobbying and political activities in an ethical, transparent, and compliant manner.

1. Policy Scope:

The Lobbying and Political Engagement Policy applies to all employees, directors, officers, contractors and third parties who may be assigned to perform related work or services on behalf of TEECL.

2. Policy Purpose:

The purpose of this Policy is to:

- Ensure a consistent approach to engagement with government officials and policymakers.
- Help identify what constitutes lobbying activities and when to seek guidance to define boundaries.
- Ensure full compliance with legal requirements pertaining to lobbying practices and political activities.
- Outline how personnel may be involved in TEECL's political activities.
- Mitigate reputational, legal, and ethical risks associated with unauthorized or improper political activity.

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3. Policy Statement:

This statement sets forth basic principles concerning the company's stance on political contributions and lobbying activities. Transparency and accountability are embedded into TEECL's public policy, political contributions and lobbying actions. TEECL is committed to being a responsible corporate citizen. The use of corporate resources in this connection guided by our internal Code of Business Conduct and Ethics and applicable laws. We believe that engagement in transparent lobbying practice is an important part of responsible corporate citizenship, which ensures the sustainability of the company's business model and the success of its stakeholders. Political risks may come from employees who engage in unauthorized political and public policy activities on their behalf or in the name of TEECL. These risks include unregistered lobbying activities as well as financial donations to political campaigns, which in certain jurisdictions are often prohibited by companies that are government contractors. We maintain a zero-tolerance stance toward bribery, improper influence, or corrupt practices in all interactions with public officials or government agencies.

4. Lobbying Principles:

TEECL is committed to adhering to the highest ethical standards when engaging in any lobbying activities. Lobbying includes any activity or work seeking to influence a public office or official on a policy, regulation, or legislation relevant to TEECL's business interests. TEECL is committed to lobbying in accordance with the relevant local laws, rules and regulations in line with its strong compliance policies and practices to prevent any illegal influence on government decisions to obtain any preferential favours. Lobbying should not be misused for any corrupt or illegal purposes, or to improperly influence any decision. It should be conducted based on the values of transparency, honesty, and integrity. There are a few responsible lobbying principles that we maintain strongly:

- Transparency, honesty and integrity are the core values reflected in how TEECL conducts lobbying.
- TEECL's employees must not attempt to improperly influence any decision by inducing lobbied stakeholders to act or not to act in violation of their lawful duties.
- All lobbying activities should enable widely informed decision making conducive to TEECL's sustainable business in pursuit of the company mission.
- All lobbying activities must be reviewed and approved by the legal and compliance teams, and where applicable, disclosed to relevant authorities.

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5. Political Engagement:

At TEECL, we do not allow any political contribution, in any form, to any political parties or individual candidates or committees for their campaigns, to be provided in return for an implied or promised official act, and we're committed to compliance with all applicable laws and disclosure requirements.

If exceptional situation warrants corporate political involvement that we believe would reflect TEECL's corporate interests, such activity would be subject to legal team's vetting, clear justification of corporate interest, non-partisanship and full transparency. We do not allow any contributions that reflect the interests of any individual or officer at TEECL. Employees may engage in political activities in their personal capacity but must clearly separate such actions from their professional roles at TEECL.

6. Monitoring and Review:

All lobbying and political activities are reviewed by senior leadership. TEECL will monitor evolving laws, particularly in jurisdictions where it operates, and disclose material political and lobbying engagements as applicable.

Niranjan Brahma (Chief Compliance Officer)

Policy	Version	Adopted	Revised
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