



TECHNO ELECTRIC & ENGINEERING
COMPANY LIMITED

Anti-Trust and Fair Competition Policy

The Anti-Trust and Fair Competition Policy highlights Techno Electric & Engineering Company Ltd.'s (TEECL) commitment to antitrust and competition laws to conduct business in fair, ethical, and transparent manner. This policy serves as a guide for all employees, stakeholders, and partners to ensure a level of playing field, uphold integrity, and foster trust in the market.

Purpose:

1. TEECL demonstrates zero tolerance towards “unfair methods of competition” and “unfair or deceptive acts of practices.”
2. This policy provides guidance across TEECL about antitrust and competitive laws and conduct business in fair, ethical, and transparent manner.
3. It is important that we act professionally, fairly, and with utmost integrity in all our business dealings and relationships; whenever and wherever we operate or engage with competitors, suppliers, clients, or any other members of our supply chain.

Applicability:

This policy is applicable to all employees of TEECL, Board Members, contractors, consultants, trainees, and service providers of our Company.

Governance:

1. Any changes to this policy shall be tracked and documented for future reference and all changes shall be performed only after prior approval of the Compliance Officer.
2. Compliance Officer shall undertake periodic review and update this policy to reflect applicable laws.
3. All exceptions to this Policy must be approved by the Compliance Officer.



Policy Framework:

- **Relationship with Competitors**

1. In today's marketplace, competitors interact in many ways, professional groups, joint ventures, trade associations, and other industry groups. TEECL encourages such dealings, provided they are fair, ethical, and transparent in nature.
2. Associates must be aware of antitrust risks in their interactions with competitors and must always maintain caution during their dealings.
3. We must ensure that no collaboration with competitors should violate Competition Laws.
4. Competition information and/or intelligence, must only be collected through legal and ethical means such as published news, press releases, information available in the public domain, etc.
5. Associate must never coordinate or collude with competitors by discussing bid amounts for winning contracts. Such prices or bid amount must always be kept confidential.
6. All bids and proposals submitted by TEECL must be the result of independent and fair assessments, without any attempt to manipulate or compromise competition.

- **Supplier and Sub-Contractor Relations**

1. TEECL shall not enter any activity constituting anti-competitive behaviors such as abuse of market dominance, collusion, participation in cartels, or inappropriate exchange of information with competitors.
2. TEECL will select suppliers and subcontractors based on objective criteria such as quality, cost, and reliability, without engaging in unfair practices that favor specific entities.
3. All contractual relationships with suppliers and subcontractors will be based on clear terms and conditions, regarding project scope, timelines, costs, etc., ensuring fair compensation and accountability.
4. TEECL ensures that all potential sub-contractors, suppliers, and partners are provided with equal opportunities to participate in the bidding and selection process.

- **Mergers:**

1. Mergers may benefit competition by allowing organizations to operate more efficiently.
2. While entering mergers, TEECL shall ensure that all requirements of Anti-Trust and Competition laws are fully complied. Also, TEECL shall make necessary disclosures as mandated by applicable laws and regulatory authorities while entering mergers.
3. The principles provided above are an indicative list and not an exhaustive list of all applicable scenarios which could result in violation of application laws. We ensure that no business practice is adopted which maybe in contravention of applicable laws and other relevant guidelines.



Consequences of Non-Compliance:

Any violation of the principles set forth in this policy by any Employee may have significant consequences for the Employee, including prosecution, fines, and other penalties for improper conduct as well as disciplinary action up to and including termination.

Conclusion:

TEECL's commitment to fair competition is an essential part of its core values and business philosophy. By adhering to the principles outlined in this policy, we contribute to the growth of a competitive, transparent, and ethical industry that benefits clients, stakeholders, and society at large.

Niranjana Brahma
(Chief Compliance Officer)

Policy	Version	Adopted	Revised
Anti-Trust and Fair Competition Policy	v 1.0	04 September 2023	NA