



**Implementation Manual & Procedures
of
Anti-Bribery Management System
(As per IS/ISO 37001:2016 Standard)**

PROPRIETARY STATEMENT

This Anti-bribery Management System (ABMS) procedure is the property of Power Grid Corporation of India Limited registered at B-9, Qutab Institutional Area, Katwaria Sarai, New Delhi-110 016. Its contents shall not be reproduced either in part or in full without the written permission of the Management Representative of Anti Bribery Management System (ABMS).

POWER GRID CORPORATION OF INDIA LTD.

(A Government of India Undertaking)

Corporate Office:

SAUDAMINI, PLOT NO. 2, SECTOR 29,
GURUGRAM-122001 (HARYANA)

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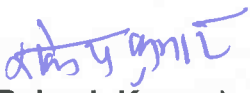
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SECTION 1.1


APPROVAL STATEMENT

- This Implementation Manual & Procedures of Anti-bribery Management System (ABMS) of Power Grid Corporation of India Ltd has been made in compliance to IS/ISO 37001:2016 standard requirements.
- This is issued and controlled by the Chief Compliance Officer as per the distribution system.

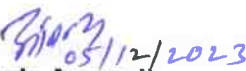
Prepared by:


(Rakesh Kumar)
Chief Manager (Vigilance)

Reviewed by:


(Deepak Kr Sahoo)
DGM (Vigilance)

Recommended by:


(Anish Anand)
Dy. CVO & Chief Compliance Officer

Approved by:


(D.K. Madan)
CVO & Nodal Officer (ABMS)


(K. Sreekant)
CMD

SECTION 1.2

AMENDMENT PROCEDURE

- 1.3.1 Any minor amendments to this manual are to be approved by CVO & for any major amendments, CMD shall approve with concurrence of **CVO (Nodal Officer, ABMS)** for issuance of new revision.
- 1.3.2 The amendment record in Section 1.3 is duly filled in and signed by the controlled copy holder.
- 1.3.3 After approval, the revised documents will be issued by the **Chief Compliance Officer** to all controlled copy holders.
- 1.3.4 It is the responsibility of the controlled copy holders to destroy the superseded versions of documents and replace the same with new revisions so as to assure against unintended use of obsolete documents.
- 1.3.5 It is also the responsibility of the controlled copy holders to fill in the amendment records in Section 1.3 after taking action as per 1.3.4 above.

The revision will come into effect only after it is formally issued by **Chief Compliance Officer**.

Note: CVC Manual & Guidelines are basic requirements and any changes in CVC Manual/Guidelines would become applicable automatically.

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SECTION 1.3

AMENDMENT RECORDS

Sl. No.	Clause No.	Page No.	New Issue No./ Date	Reasons for Change
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SECTION 1.4

LIST OF ABBREVIATIONS

ABMS	-	ANTI-BRIBERY MANAGEMENT SYSTEM
AM	-	ASSET MANAGEMENT
BDD	-	BUSINESS DEVELOPMENT DIVISION
CC	-	CORPORATE CENTRE
CDA	-	CONDUCT DISCIPLINE & APPEAL
CE	-	COST ENGINEERING
COMML	-	COMMERCIAL
CMD	-	CHAIRMAN AND MANAGING DIRECTOR
CMG	-	CORPORATE MONITORING GROUP
CP	-	CORPORATE PLANNING
CS	-	CONTRACT SERVICES
CVC	-	CENTRAL VIGILANCE COMMISSION
CVO	-	CHIEF VIGILANCE OFFICER
DOP	-	DELEGATION OF POWER
ED	-	EXECUTIVE DIRECTOR
FQA	-	FIELD QUALITY ASSURANCE
F&A	-	FINANCE & ACCOUNT
GA&C	-	GRID AUTOMATION & COMMUNICATION
HRD	-	HUMAN RESOURCE DEVELOPMENT
HRM	-	HUMAN RESOURCE MANAGEMENT
HVDC	-	HIGH VOLTAGE DIRECT CURRENT
IB	-	INTERNATIONAL BUSINESS
IEM	-	INDEPENDENT EXTERNAL MONITOR
JV	-	JOINT VENTURE
MM	-	MATERIALS MANAGEMENT
ODI	-	OFFICER IN DOUBTFUL INTEGRITY
O&M	-	OPERATION & MAINTENANCE
QA&I	-	QUALITY ASSURANCE & INSPECTION
RTI	-	RIGHT TO INFORMATION
S/S	-	SUB-STATION
TL	-	TRANSMISSION LINE
ERP	-	ENTERPRISE RESOURCE PLANNING

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SECTION 1.5

DISTRIBUTION SYSTEM

This manual is a **controlled document** and copies are maintained by the **Chief Compliance Officer**. The holders of controlled copy are responsible for the upkeep. Controlled copies are identified by specific copy number and stamped as: **CONTROLLED**.

Copy No.	Designation of the Personnel
01	Chief Compliance Officer
02	Company Secretary
03	ED (Corporate Planning)

Note: This manual is available on the POWERGRID INTRANET as well as POWERGRID website.

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SECTION 2.0

Background for ABMS in POWERGRID

There are various prevailing laws and regulations to prevent bribery such as Prevention of Corruption Act 1988 (amended in 2018), Foreign Contribution Regulations Act 2010 (FCRA), Right to Information Act 2005 (RTI), Central Vigilance Commission Act 2003 (CVC), Lokpal and Lokayuktas Act 2013, Companies Act 2013, Prevention of Money Laundering Act 2002 (PMLA), Whistleblower Act 2011, etc. However, with an aim to help the organization in designing and implementing reasonable and proportionate measures to prevent, detect and respond to bribery, an internationally recognized common framework focusing on anti-bribery compliance is required in the organization. IS/ISO 37001 sets out requirements and provides guidance for the management to comply with anti-bribery laws and voluntary commitment applicable to its activities.

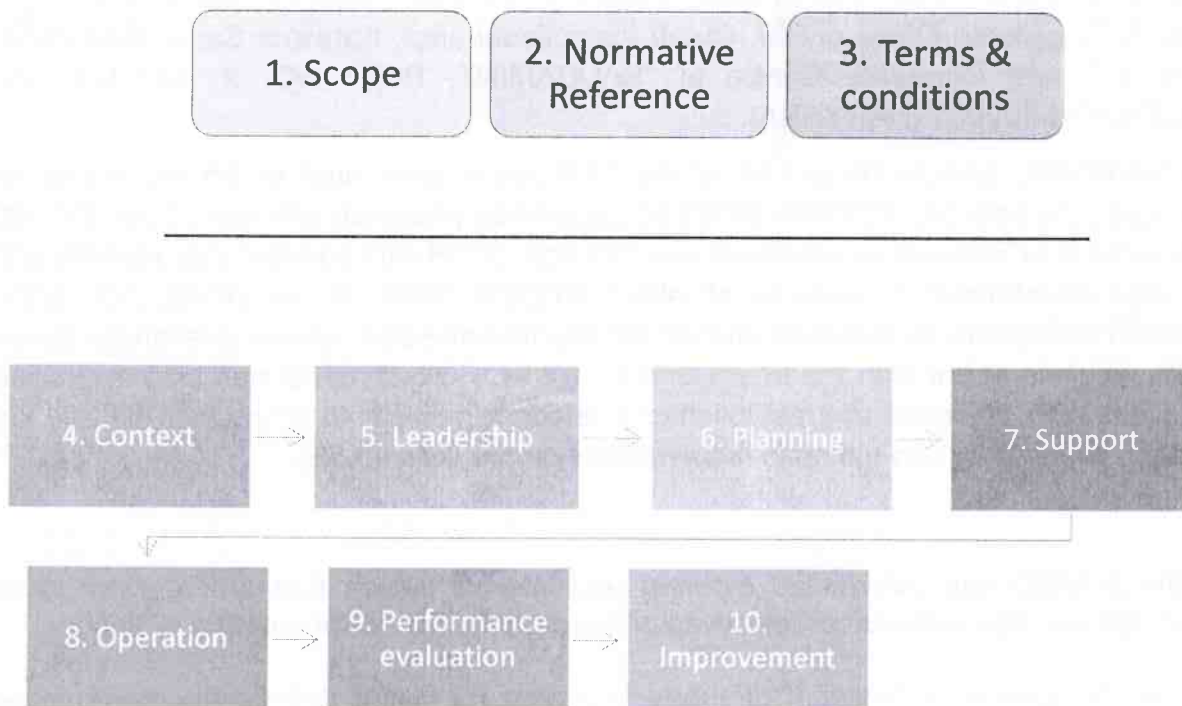
Power Grid Corporation of India Ltd (POWERGRID), a Maharatna company, advocates the principles of transparency, probity & ethics in all its functioning. Vigilance department undertakes preventive, proactive as well as punitive vigilance activities and ensures that the best ethical practices are followed in POWERGRID. Aimed at enhancing transparency & conformance to ethics in the organisation and further aligning all activities in compliance with the IS/ISO Standard, the governing body (i.e. Board) of POWERGRID has decided to implement the Anti-Bribery Management System (ABMS) in all its establishments complying with IS/ISO 37001:2016 standard.

Accordingly, ABMS policy, implementation manual & procedures fulfilling the requirements in compliance to IS/ISO 37001 in the organisation has been prepared for implementation.

Section 3.0

Key clauses of ABMS IS/ISO 37001:2016

All the requirements of ABMS IS/ ISO 37001:2016 are enumerated in 10 nos. of sections/clauses. Section 1 to section 3 deals with Scope, Normative Reference, Terms & conditions respectively. The major parts are enshrined in the section 4 to 10 are as below:-



This implementation Manual & Procedures addresses all the provisions/requirements for implementing IS/ISO 37001 in all operations/ functions of POWERGRID.

SECTION 4.0

UNDERSTANDING THE ORGANIZATION AND ITS CONTEXT

4.1 About the Organisation

Power Grid Corporation of India Limited (POWERGRID), is a Schedule 'A', 'Maharatna' Public Sector Enterprise of Govt. of India which was incorporated on 23rd Oct 1989 under the Company Act, 1956. POWERGRID is a listed Company, with 51.34% holding of Government of India and the balance is held by Institutional Investors and public. It is India's largest Power Transmission Utility and a Public Listed Company since 2007, has its Registered Office at B-9, Qutab Institutional area, Katwaria Sarai, New Delhi-110 016 and Corporate Centre at "SAUDAMINI", PLOT NO. 2, SECTOR 29, GURGAON-122001 (HARYANA).

POWERGRID wheels about 45% of the total power generated in the country on its transmission network. POWERGRID has a pan India presence with more than 176,180 Circuit kms of Transmission network and 275 nos. of EHVAC & HVDC sub-stations with a total transformation capacity of about 512,601 MVA as on APRIL 30, 2023. POWERGRID has consistently maintained the transmission system availability above 99% which is at par with the International Utilities. POWERGRID has also diversified into Telecom business and established a telecom network of more than 82,294 km across the country and maintain the availability more than 99.5%.

POWERGRID has determined external and internal issues that are relevant to its purpose and has addressed objectives of the organisation for prevention of bribery.

- a) Delegation of Power (DoP) duly approved by Board defines decision-making authority of the organization.
- b) POWERGRID business model is mainly for bulk transmission of electric power. Procurement and execution of all projects (new and O&M) are carried out as per POWERGRID Work Procurement Policy & Procedure document. Bidding & Contract documents covers provision of Integrity Pact by the Organization's business associates & vendors.
- c) All the establishments and offices located Pan India are under the purview of ABMS as well as the entities (JVs/Subsidiaries) over which the organization has control.
- d) All statutory, regulatory, contractual and professional obligations and duties like annual return of the company, company's act, dividend distribution policy, disclosure as per listing agreement, reporting of frauds etc. are complied as per the Companies Act 2013.

4.2 Scope of ABMS

POWERGRID has determined its scope applicability of ABMS throughout the organisation. The organisation is committed to establish Anti-Bribery Management System as per applicable Indian standard of ABMS in all its establishments and business functions. The scope of ABMS covers all establishments and functional departments of Corporate Center, Regional Head Quarters & all site offices under the Regions. Organization Chart of POWERGRID is attached at Annexure-B.

4.3 Bribery Risk Assessment

POWERGRID has established a system for assessment of Bribery risks in the organisation. In this regard, various initiatives have been taken-

- (i) Risks pertaining to bribery has been identified, assessed and the suitable actions are taken to mitigate the assessed bribery risks.
- (ii) Sensitive Posts/Risk areas of various department, which are prone to bribery and corruption are identified by the Top Management. Transfer/rotation of employees posted on these sensitive posts is implemented as per Policy/Guidelines.
- (iii) Sensitivity of department & personnel are reviewed at an interval of every two years as per policy regarding sensitive posts.
- (iv) CVO (NODAL Officer ABMS) & Dy CVO (Chief Compliance Officer) keep watch on significant change in the structure and activities of the organization.
- (v) Chief Compliance Officer keeps a watch for changes in any bribery related risk assessment, if required from time to time.
- (vi) ODI & Agreed List of employees are maintained and reviewed as per CVC Guidelines.
- (vii) Preventive Vigilance workshops & Vendor Meets are held for spreading awareness on ethics & anti-bribery among employees & stakeholders.

Reference Documents:

- HR Circular regarding identification of sensitive positions dated 27th July 2023
- Transfer/Rotation policy of executives
- ODI /Agreed List Guidelines

5.0 LEADERSHIP

5.1 Anti Bribery Management System (ABMS) Policy

Board of POWERGRID has demonstrated leadership and commitment in respect to ABMS and has approved Anti-bribery Policy statement as follows:

"POWERGRID has a vision to be a world class, integrated, global transmission company with dominant leadership in emerging power markets ensuring Reliability, Safety and Economy. POWERGRID advocates the principles of Transparency, Probity and Ethics in its functions.

As an added endeavor to ensure compliance of ethical norms and transparency, POWERGRID is committed to establish Anti-Bribery Management System as per applicable Indian standard of ABMS in all its establishments and business functions."

Reference Document:

- Board Approval document for ABMS Policy

5.2 Roles/Responsibility and Oversight in respect of ABMS

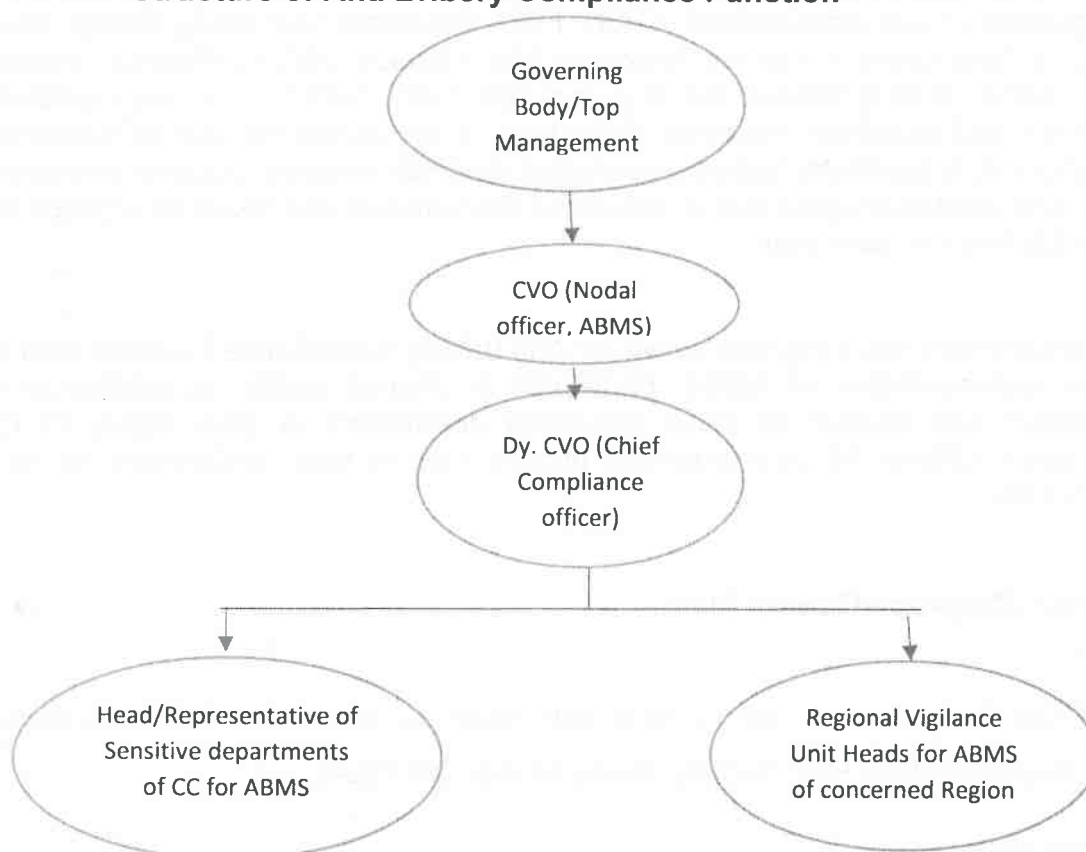
- Power Grid Corporation of India has established a system to define Roles and responsibility of Top Management. ABMS Compliance function has been entrusted through the NODAL Officer (ABMS) & Chief Compliance Officer.
- Top Management including the Governing Body (i.e. Board of Directors) shall review information related to the content and operation of ABMS at planned intervals (at least once in a year) and ensure that adequate and appropriate resources are allocated and assigned.

5.3 Anti-bribery compliance function -

- The ABMS Compliance function has been entrusted to the Vigilance Department. The department has been adequately resourced and has competence, independence, and authority along with its direct access to Board & Management Functionaries.
- Vigilance Department is responsible for implementation of the ABMS, providing advice and guidance on the anti-bribery management system and issues relating to bribery. Further, wherever necessary, the department shall provide training and awareness regarding ABMS and shall ensure that the ABMS conforms to the requirements of IS/ISO ABMS 37001 standard. Structure of Vigilance department is attached at Annexure C.

- CVO, POWERGRID shall act as **Nodal Officer** for ABMS and Dy CVO shall act as **Chief Compliance Officer** for the implementation and compliance of the ABMS. Further, all executives at every level have been made responsible for the ABMS application and compliance in their department or functions.
- Matter related to bribery shall be reported by Chief Compliance Officer to Nodal Officer after due investigation by the Vigilance department. Further action in accordance with extant Rules/Procedures/Guidelines shall be recommended by Nodal Officer to Top Management/Governing Body, as applicable.
- Each high risk/sensitive department Head shall nominate departmental representative for ABMS who shall identify the potential risks, mitigation plan and take role in internal audits and report to Chief Compliance Officer regarding any bribery or bribery risk or Non-conformities related to ABMS.
- Vigilance Head of each Region shall look after the ABMS of that Region and shall appraise the Chief Compliance Officer regarding identification of bribery, potential risks & mitigation plan implementation, etc.

5.4 Structure of Anti Bribery Compliance Function-



Note- HoD of Sensitive departments at Region/Representative of sensitive departments at Region shall interact with Regional Vigilance Unit Heads for ABMS of concerned Region

6.0 PLANNING

ABMS IS/ISO 37000:2016 standards require the organization shall refer to external and internal factors determined in context, requirements of stakeholders as determined, bribery risk assessment and their effective control & scope for improvement.

6.1 Objective

POWERGRID has defined its objectives for ABMS in the organisation. The ABMS objectives are identification of bribery Risks, their assessment, communication, mitigation or to control the risk with continual improvement with a view to foster an ethical environment along with good governance and in consistent with the Anti-bribery policy.

6.2 Risk Assessment and Plan to Mitigate

Sensitive post risk analysis carried out by an Executive Director level committee and the committee report is approved by CMD after review by Director Personnel & CVO. At present, departments like Engineering, Contracts Services and Materials Management, Asset Management, QA&I, FQA, Corporate Monitoring Group, Human Resource Development, Human Resource Management (HRM), Finance, Vigilance, GA&C, TBCB, BDD & International Business (IB), LAW, ERP & IT etc are identified for higher risk and sensitivity. However, there may be inclusion/exclusion of departments for higher risk & sensitivity based on sensitive post risk analysis outcome in every two years. The identified higher risk & sensitivity departments are taken for Internal Audit on sample basis in each year.

Each department has a representative for Anti Bribery Compliance Function who shall ensure implementation of ABMS, participate in internal audits as auditee in own department and auditor in cross functional department & also report to Chief Compliance Officer for any potential bribery risk in own department or in the organisation.

6.3 Risk Mitigation/Control Plan:

Risk Mitigation or their control plan shall be mentioned for each sensitive departments in Risk Register for high/moderate Risks.

Reference

- List of Sensitive Posts

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7. SUPPORT

7.1 Providing Resources for ABMS

POWERGRID's Top Management is committed to provide appropriate resources considering nature of its operation and bribery risk for establishment, implementation, maintenance, and continual improvement of ABMS.

7.2 Documented Information

Records required as per ABMS have been treated as controlled and shall be kept under the control of Vigilance Department. The same have been adequately protected (e.g., from loss of confidentiality, improper use, or loss of integrity). For ABMS compliance related records, the same shall be maintained and retained for minimum 3 Years.

Reference :

- Record Retention Policy of Vigilance Department

7.3 Competency & Training

- POWERGRID is committed to impart training to all employees including new recruits in order to comply with the anti-bribery management policy & Anti-Bribery Management System. The ABMS trained executives of Vigilance Department has sufficient domain expertise and competency. External faculty/agencies are also engaged for training on need basis.
- POWERGRID is constantly using various forums to propagate awareness to its employees, business associates regarding ABMS policy and its benefits, also the implications of not conforming with ABMS. Further, each department representatives for Anti bribery Compliance and Heads of Regional Vigilance shall report to the Chief Compliance Officer regarding bribery risk of their departments, identification & mitigation plans and for continual improvement.
- During the various workshops, Trainings/ Awareness Programs, training/ awareness on Bribery (ABMS), employees are trained on regular basis. Documented information regarding employees trained, content of training, duration etc are maintained.

Reference

- Training certificate by BIS/External Agencies to POWERGRID employees
- HRD Training Module for New Recruits.
- Preventive Vigilance Workshops & HRD Training Data//Records

7.4 Communication

Vigilance Department of POWERGRID shall be responsible for communication related to ABMS. Further, ABMS Policy shall be displayed on POWERGRID's website for all stakeholders & physically in all establishment of POWERGRID.

8.0 OPERATION & CONTROL

8.1 Control-

- POWERGRID is implementing all process required to meet requirements of the ABMS and to implement the actions. The organisation has identified the process of establishing criteria's, implemented controls and keeps all relevant documentation. Criteria have been established through various guidelines of the CVC in respect of Vigilance functions & activities including complaint handling, investigations, scrutiny of audit reports, inspections, maintaining ODI & Agreed List, etc.
- The controls are implemented through regular inspections, verification / investigation of cases as per timeline of CVC.
- POWERGRID is committed to plan, implement, monitor and control the processes needed to meet the requirements of the ABMS Procedures to prevent bribery and is committed to implement Anti-bribery measures, managing inadequacy of Anti-bribery controls, raising concerns and investigating bribery within the organization.

8.2 Raising Concerns

- POWERGRID encourages and enable persons to report in good faith or based on a reasonable belief attempted, suspected and actual bribery or any violation of or weakness in Anti-Bribery Management System.
- Apart from hardcopy complaints addressed to CMD and CVO, online complaint can be lodged directly to CVO. The online link for this is made available on the website. POWERGRID has also implemented the online Employee Grievance Management System. The complaint of vigilance angle are taken up by Vigilance department and complaints of administrative nature are taken up by HR for further necessary action.
- Though anonymous complaints are not taken up as per CVC guidelines, there is a mechanism of raising concern where complaint needs to keep his details secret. Any citizen can raise complaint through Public Interest Disclosure & Protection of Informers Act (PIDPI). POWERGRID is continuously spreading awareness about PIDPI. Further, POWERGRID has its own Whistle Blower Policy for raising concerns and there are dedicated Nodal officers for handling such complaints.
- CVC extant guidelines are followed for protection of complainant.

Reference

- Online Complaint Facility on website

- CVC circular/guidelines on PIDPI
- Compendium of Vigilance Circulars 2023 of POWERGRID
- POWERGRID Whistle blower Policy
- Internal Grievance Management System
- CVC guidelines regarding protection of Complainants

8.3 Provision of Rule against bribery practices and action thereof

POWERGRID has implemented procedures in respect of anti-bribery practise in respect of employment and have been providing continuous training about ABMS to all. There is Conduct, Discipline and Appeal (CDA) Rules enforced and implemented in the organisation which details about various misconducts including bribery and unethical practises. The CDA rules has defined punitive action against those who are found involved in such practise.

Reference :

- POWERGRID CDA Rules
- Code of Ethics for Senior Management of POWERGRID
- Business Ethics for Board of Directors
- POWERGRID Fraud Prevention & Whistle-Blower Policy

8.4 Investigation of Bribery related cases

All bribe related cases shall be investigated by the Vigilance Department and Disciplinary Authority as per POWERGRID CDA Rules shall take suitable action against the delinquent official, if any.

Reference

- POWERGRID CDA Rules
- CVC Manual 2021
- Integrate Management System Procedure of Vigilance Department

8.5 DUE DILIGENCE-

Power Grid has established a system to assess the nature and extent of the bribery risk in relation to specific transaction, projects, activities, business associates and personnel. The assessment shall include any due diligence necessary to obtain sufficient information to assess the bribery risk. The due diligence shall be updated at a defined frequency so that changes and new information can be properly considered.

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8.6 Salient Processes/Activities of Vigilance department -

Sr. No.	Process Activities	Reference Documents
1	Complaint Handling Mechanism (Anonymous, Pseudonymous, PIDPI, Investigation of complaints, Jurisdiction etc.)	CVC Manual & SOPs as mentioned in Compendium of Vigilance Circulars
2	CTE Inspections, Process Online & Surprise Inspections	CVC circulars /Guidelines
3	Preparation of Agreed List/ODI List	CVC Manual
4	Scrutiny of Audit Reports	CVC Manual
5	Preventive Vigilance, Ethics & Anti-bribery awareness programs	Preventive Vigilance Workshops, Observance of Vigilance awareness week report
6	Scrutiny of Annual Property Returns of employees	CVC Manual, Property Declaration Portal
7	Prevention of Corruption	CVC Manual, PC Act

These documents provide a strong mechanism to ensure that regular preventive inspections/surprise inspections, scrutiny of works, systems and procedures, files are being undertaken. These activities are carried out by Vigilance Department on regular basis and throughout the year.

To effectively carry out these activities, various IT initiatives are implemented like Vigilance Online Management System for complaints, investigations, disciplinary action records, Vigilance Inspection System 2.0 for records of various types of inspections, processing Vigilance Clearance through Employee Self Service portal, Annual Property Return Portal for online scrutiny of employee property returns & CVO dashboard etc.

8.7 Financial & Non-Financial Controls

- POWERGRID has implemented financial controls policy in transactions, projects or activities and relationships. There is system of multi tier authority in DoP for payment approval and larger transactions require higher senior level approval. There is no cash payments and all payments are through online payments and rarely by DD/Cheque. All payments processing approvals are made in ERP's Employee Self Service (ESS) workflow with at least two signatures on payment

approval by Finance department. All bills both employee & third party (contractors, vendors, service providers, etc) are processed through online faceless payment management system PEPPC (POWERGRID Employee Payment Processing Center) & PPPFC (POWERGRID Processing Payment Facilitation Center) respectively. Further, POWERGRID have Bill Tracking System (BTS) for online checking of status of bills and monitoring processing of bills. These initiatives have made finance functions transparent & prevents risk related to bribery.

- POWERGRID has established a system to implement non-financial controls that manage bribery risk with respect to various areas such as forming guidelines for Procurement as per DoE Guidelines, tendering through GeM and online PRANIT Portal, Contract Closing Portal, Information on Record Portal, various online applications in Employee Self service Module for HR functions, Training Need assessment (online TNA system for HRD), Online transfer request portal, Compendium of approved /empanelled contractors, sub-contractors, Online Inspection Management System through SAP application, empanelment of suppliers and consultants, assessing necessity of services to be provided by a business associate, properly carrying out of services at reasonable and prorata payments, at least two persons to evaluate the tenders and approve the award of a contract, separation of duties (placement vs. manage the contract vs. approve work done), at least two persons signing contracts, higher level of management oversight on potentially high bribery risk transactions, Anti bribery clause in tender, Integrity Pact etc.

References-

- POWERGRID's DoP
- Compendium of Vendors
- ESS Workflow for Financial Control
- CDA Rules
- WPPP of POWERGRID
- Procurement Manual/ Guidelines released by Ministry of Finance
- Business Ethics and code of Conduct by senior management
- Integrity Pact

8.8 Implementation of anti-bribery controls to organizations controlled and business associates for mitigating the relevant bribery risk.

POWERGRID has implemented Anti Bribery Management System among other organisations over which it has control directly or indirectly through Integrity Pact as per laid down procedure, to the extent that is reasonable and proportionate with regard to the bribery risks faced. Also, for high value contracts, there is provision of IEM (Independent External Monitor) appointed by CVC to look into the Contractual aspects of awarded contracts.

Reference-

- IEM Provision of Tender in Contract Document

8.9 Anti-bribery commitments-

For business associates, which pose more than a lower bribery risk, POWERGRID has implemented procedures which include the followings:

- a) Business associate's commitment to preventing bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transaction, project, activity or relationship.
- b) POWERGRID is committed to terminate the relationship with the business associate in the event of bribery by, on behalf of, or for the benefit of the business associate in connection with the relevant transactional project, activity or relationship.

8.10 Procedure to regulate the issues concerning gifts, hospitality, donations and similar benefits.

- In respect of Gifts, Hospitality, Donations and Similar Benefits. POWERGRID has framed CDA Rules that are designed to prevent the offering, provision or acceptance of gifts, hospitality, donations and similar benefits where the offering, provision or acceptance is, or could reasonably be perceived, as bribery.
- A useful control mechanism to avoid as far as possible any gifts, hospitality, donations and other benefits, which could reasonably be perceived by a third party to be for the purpose of bribery.
- Further, to ensure that the vendors don't get access to sensitive department, access has been restricted/ controlled for visitors.

Reference

- CDA Rules of POWERGRID
- HR Guidelines/Circular for restricted access of visitors

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9. PERFORMANCE EVALUATION

Power Grid Corporation of India Ltd is committed to determine what needs to be monitored, what methods shall be used to ensure valid results, when monitoring and measuring shall be performed and its documentation for monitoring, measuring, analysing and evaluating Anti-bribery policies through various polices, guidelines, preventive checks and inspections.

9.1 Internal Audit

POWERGRID has its trained and competent professional to undertake the audit. The audits shall be targeted at the organisation primary brisk areas. This audit shall provide reasonable assurance to the top management that the anti-bribery managements system has been implemented is operating effectively. POWERGRID has established this procedure to conduct the Internal Audit:-

Subject	Detailed Remarks
Frequency of Audit	Once/year However, it can be conducted as per requirement and instruction of the Top Management. High bribery risk would be selected for audit in priority to a low bribery risk functional area. Further, the audit shall be planned normally in advance.
Internal Audit Plan	The organisation shall make internal audit plan covering various factors such as status of previous audit, significant areas, criteria covering results of risk assessment, stakeholder complaints, serious internal NC (Nonconformities) and External Audit Findings
Internal Audit Schedule	Audit Schedule shall be prepared covering date, time of audit, auditor's and auditee names, departments) to ensure un-biased audit approach. The same shall be conducted cross-functionally.
Process of conducting Internal Audit	Internal Audit shall be conducted by trained and competent professional in accordance with audit check list. Conflict of interest shall be duly taken care of i.e no one will do the audit of their own department.
Audit Checklist	This shall be based upon the audit scope and audit criteria for an effective Internal Audit.
Audit Observation	If any NC is observed, it shall be raised through internal audit NC Report. Further, if any potential NC/opportunity for improvement is identified, the same shall be reported taking necessary corrective/Riks management actions.

Actions on observations	Due corrective action shall be taken on NC /potential/NC observed during the audit and wherever required Route Cause Analysis shall also be carried out.
Review of Actions	Any raised/observed NC / potential NC / Opportunity for improvement (OFI) shall be shared with the Top Management for review. Besides above, effectiveness of the corrective/preventive actions taken against the observed NC/OFI raised during the previous audit shall be reviewed.

Internal audit in respect of Bribery Risk to provide information that the ABMS is conforming to the organization's requirements and needs shall be conducted. The major observations of the audit report and actions taken shall be put up to the top management.

References-

- Internal Audit Plan/Schedule
- Inter Audit Format & Checklist
- Internal Audit Report

9.2 Management Review Meeting

- The adequacy of implementation and the results of investigation/audits related to Bribery are to be reviewed and reported to the top management. Board of POWERGRID shall undertake periodic reviews, at planned intervals, at least once a year, or based upon information provided by the Top Management.
- The top management shall review the following inputs, but not limited to the status of actions from previous management reviews, changes in external and internal issues that are relevant to the ABMS, changes in needs and expectations of interested parties that are relevant to the ABMS and information on non-conformities, non-compliance, monitoring, audit results and for continual improvement.

9.3 Review By Anti-Bribery Compliance Function and Reporting

- Chief Compliance Officer shall review the adequacy, effectiveness and implementation of the anti-bribery management system, including the results of investigations and audits and report to Top Management at least once in a year.
- CVO (Nodal Officer, ABMS) shall carry out meeting with the top management for all improvements pertaining to anti-bribery measures during regular/structured meeting.

Reference

- Management Review Meeting

2/10/20

10. IMPROVEMENT

10.1 Non-Conformities and Action Thereon

- During ABMS Audit, in case of any non-conformities, i.e. non-fulfilment of any requirement if identified, and found justified, POWERGRID shall take prompt action to control and correct it.
- If any Non Conformity is found non-justified, proper comments/reply/justification shall be made to the Auditor concerned. The status of actions (Corrections, Root Cause analysis, Corrective and Risk Management Action) shall be communicated to the Auditors.
- POWERGRID shall evaluate the need for action to eliminate the causes of nonconformities by reviewing, determining the cause. Further to prevent the re-occurrence of nonconformities, it shall be determined if similar non-conformities exist or could potentially occur. Also, the adequacy, effectiveness and suitability of the ABMS that has been implemented, will be reviewed regularly.

Reference

- Audit Report & Corrective Action Report

10.2 Continual improvement

POWERGRID is committed for continual improvement to ensure the suitability, adequacy and effectiveness of the Anti-Bribery Management System (ABMS) and to achieve its objectives easier.

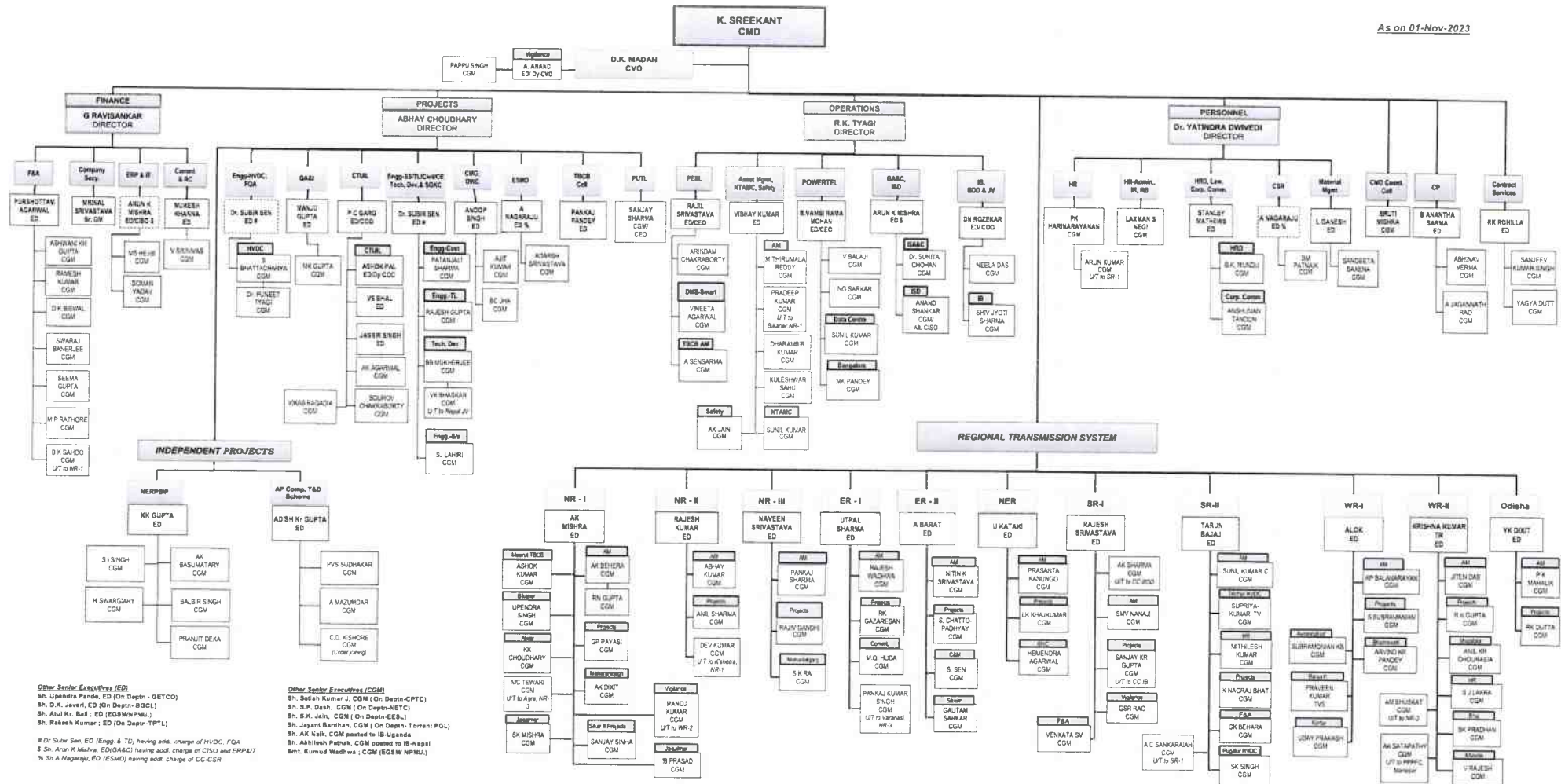
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LIST OF REFERENCES-

- HR Circular regarding identification of sensitive positions
- Transfer/Rotation policy of executives
- ODI /Agreed List Guidelines
- Board Approval document for ABMS Policy
- Minutes of Structured Review Meeting
- List of Sensitive Posts
- Training certificate by BIS to POWERGRID employees
- HRD Training Module for New Recruits.
- Preventive Vigilance Workshops Records
- Online Complaint Facility
- CVC circular/guidelines on PIDPI
- Compendium of Vigilance Circulars 2023 of POWERGRID
- POWERGRID Whistle blower Policy
- Circular Internal Grievance Management System
- CVC circular regarding protection of Complainants
- POWERGRID CDA Rules
- Code of Ethics for Senior Management of POWERGRID
- Integrate Management System Procedure of Vigilance Department
- Work & Procurement Policy Procedure (WPPP)
- Contract Bid Documents
- Integrity Pact
- HR Policy Manual
- POWERGRID's DoP
- Compendium of Vendors
- ESS Workflow for Financial Control
- Procurement Manual/ Guidelines released by Ministry of Finance
- Cyber Security Policy
- ABMS Policy
- Minutes of the meeting of IEMs
- Guidelines/Circular for restricted access of visitors
- Audit Report & Corrective Action Report
- System Improvement Circulars
- Internal Audit Plan/Schedule
- Inter Audit Format & Checklist
- Internal Audit Report

POWERGRID ORGANOGRAM

As on 01-Nov-2023



ORGANIZATION CHART OF VIGILANCE DEPARTMENT

