

Anti-Bribery Management System Manual

[As per ISO 37001:2016 Standard]

(Version # 3)



STEEL AUTHORITY OF INDIA LIMITED

(A Maharatna Central Public Sector Enterprise)

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Version Number :3.0

Date: 11.07.2023

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Annexures to the ABMS Manual

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2	D/ABMS/OC 01 CO/Ver 1.0	Organisation Chart of Corporate Office	01	01.09.2022	56
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22	D/ABMS/IP/ BSL/Ver 2.0	Interaction of Processes at BSL	02	01.09.2022	77

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34	P/ABMS/PR 01/ Ver 2.0	Procedure For ABMS Management	02	11.07.2023	91-95
35	D/ABMS/CM 01/ Ver 2.0	Context Mapping	02	11.07.2023	96-98
36	D/ABMS/N&E 01/ VER 2.0	Interested Party Need & Expectations Mapping	02	11.07.2023	99-101
37	D/ABMS/OB 01/ Ver 3.0	ABMS Objectives	03	11.07.2023	102-104
38	D/ABMS/RM 01/ Ver 2.0	Risk Assessment Methodology	02	11.07.2023	105-109
39	F/ABMS/RA 01 Ver 2.0	Risk Assessment Format	02	11.07.2023	110-111
40	D/ABMS/SM 01/ Ver 2.0	Skill Matrix	02	11.07.2023	112-113
41	D/ABMS/RR 01/ Ver 3.0	Roles & Responsibilities	03	11.07.2023	114-124
42	F/ABMS/CL 01/ Ver 2.0	Internal Audit Checklist	02	11.07.2023	125-128
43	F/ABMS/IA NC 01 / Ver 2.0	Non Conformities Report	02	11.07.2023	129-130
44	F/ABMS/NCCA 01 / Ver 2.0	Non Conformity Corrective Action Report	02	11.07.2023	131-132
45	F/ABMS/MRM 01 / Ver 2.0	Management Review Meeting	02	11.07.2023	133-135
46	F/ABMS/GF 01/Ver 2.0	Format for Declaration of Gift	02	11.07.2023	136-137

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48	D/ABMS/POL E 01/Ver 1.0	ABMS Policy (English)	01	08.04.2022	139
49	D/ABMS/POL H 01/Ver 1.0	ABMS Policy (Hindi)	01	08.04.2022	140

Document Approval

Section Number: ABMS-02	Version Number :3.0	Date: 11.07.2023
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The signatures below certify that this Anti Bribery Management System Manual has been reviewed and accepted, and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

Prepared by	GM (Vigilance)	11.07.2023
Reviewed by	CGM (Vigilance)	11.07.2023
Approved by	CVO, SAIL	11.07.2023

Amendment Record

Section Number: ABMS-03	Version Number :3.0	Date : 11.07.2023
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This manual is reviewed to ensure its continuing relevance to the systems and process that it describes. A record of contextual additions or omissions is given below:

S#	Section/Clau ses/Doc/ Format No	Changes incorporated in	Reasons for change	New Version No.	Approval Date
1	Section ABMS-01	Content	Annexures details and Page Nos. added for easy ref.	2	01.09.2022
2	Cl. 2.0	Organisation Profile	Figures updated	2	01.09.2022
3	Cl.3.1	Scope Statement modified	Scope Statement and process covered for CO modified /updated.	2	01.09.2022
4	Cl.4.4	Interaction Process	Interaction Process updated	2	01.09.2022
5	Cl.4.5.3	Risk Assessment	Clause modified logically.	2	01.09.2022
6	Cl.4.5.4	Risk Assessment	Risk Assessments Format Ref. Added.	2	01.09.2022
7	Cl.5.1.4	Top Management	Clause modified for HODs. Org Chart of CO added.	2	01.09.2022
8	Cl. 5.2	Anti-Bribery Policy	Ref of Bilingual Policy added	2	01.09.2022
9	Cl. 7.2.2	Employment Process	Ref of Vigil Mechanism and PIDPI added.	2	01.09.2022
10	Cl.7.4.2	Communication	Clause modified to reflect the actual communication methods	2	01.09.2022
11	Cl. 8.1, 8.3, 8.4,	Operations Planning & Control, financial & nonfinancial control	Ref. of SAIL Policy for Import of Coal and Coke added.	2	01.09.2022
12	Cl. 8.6	Anti Bribery Commitments	Ref of anti-bribery undertaking from Suppliers/ Vendors added.	2	01.09.2022
13	Cl. 8.7	Gift , Hospitality donations and similar benefits	Ref. of format for declaration of Gift added.	2	01.09.2022
14	Cl 9.2 , 9.4	Internal Audit	Ref. Of Compliance Team and Management Review Meetings added.	2	01.09.2022
15	Annexure-1	Org Chart of Bokaro Steel Plant	Updated	2	01.09.2022
16	Annexure-2	Index of ABMS Documents / Formats	Updated after addition of Risk Assessment format and Format for Declaration of Gift	2	01.09.2022
17	Annexure-2	ABMS Objectives for 2022-23	Addition of Objectives 1, 2 & 3	2	01.09.2022
18	F/ABMS/RA 01 Ver 1.0	Risk Assessment Format	Addition	1	01.09.2022

S#	Section/Clau ses/Doc/ Format No	Changes incorporated in	Reasons for change	New Version No.	Approval Date
19	F/ABMS/GF/ 01/Ver 1.0	Format for Declaration of Gift	Addition	1	01.09.2022
20	Annexure-2	Roles & Responsibilities of Vig Coordinator	Removed. There is no separate Vigilance Coordinator. CVO has been nominated as the Nodal Officer for ABMS.	2	01.09.2022
21	Annexure-3	Docs referred to in the ABMS Manual	Updated with inclusion of SAIL Policy for Import of coal and Coke	2	01.09.2022
22	Annexure-4	Organisation Chart for CO	Addition	1	01.09.2022
23	Annexure-5	ABMS Policy (Vision Statement) in English and Hindi	Addition	1	01.09.2022
Amendments in July 2023					
24	Section – ABMS-01	Content	Sections No. included in Index. Version, Page Nos, Date updated	3	11.07.2023
25	Section – ABMS-01	List of Annexures to the ABMS Manual	Rearranged with additions of other Plants and Units for ABMS	3	11.07.2023
26	Section – ABMS-03	Amendment Record	Updated for version 3 revision	3	11.07.2023
27	Section – ABMS-03/A	Document Distribution	Section ABMS-03 for Document Distribution renumbered as ABMS-03A. Contents revised due to inclusion of other Plants and Units for ABMS	3	11.07.2023
28	Section – ABMS-04	Abbreviations, Acronyms, Terms & Definitions	New Abbreviations added	3	11.07.2023
29	Cl. 2.0	Organisation Profile	Figures updated. Profiles of Plants/ Units added.	3	11.07.2023
30	Cl.3.1	Application of ABMS	Scope Statements, Boundary and Processes updated / added for Plants / Units	3	11.07.2023
31	Cl. 4.1	Context of the Organisation	Cross Reference amended	3	11.07.2023
32	Cl 4.2	Needs & Expectations	-Do-	3	11.07.2023
33	Cl 4.3	Scope of ABMS	Revised due to inclusion of other Plants and Units for ABMS	3	11.07.2023

S#	Section/Clau ses/Doc/ Format No	Changes incorporated in	Reasons for change	New Version No.	Approval Date
34	Cl.4.4	Interaction Process	Interaction Process of Plants and Units shifted as Annexure of the Manual	3	11.07.2023
35	Cl 4.5.4	Risk Assessment	Cross Reference amended	3	11.07.2023
36	Cl 5.1.2	Top Management	Clause modified due to inclusion of other Plants / Units and Cross Reference added	3	11.07.2023
37	Cl 5.1.3	Nodal Officer for ABMS	Clause Added	1	11.07.2023
38	Cl 5.1.4	Management Representative	Clause modified due to inclusion of other Plants / Units	2	11.07.2023
39	Cl 5.1.6	Addl. Chief ABMS Officer	Clause Added	1	11.07.2023
40	Cl 5.1.7	HOD	Cross Reference amended	3	11.07.2023
41	Cl 5.2	Anti-Bribery Policy	Cross Reference amended	3	11.07.2023
42	Cl 5.3.1	Roles & Responsibilities	Cross Reference amended	3	11.07.2023
43	Cl. 5.3.2	Anti-bribery compliance function	Clause modified due to inclusion of other Plants / Units and Cross Reference added	3	11.07.2023
44	Cl 6.2	Anti-Bribery Objectives	Clause modified and Cross Reference added	3	11.07.2023
45	Cl 7.2.1	Competence	Cross Reference amended	3	11.07.2023
46	Cl 7.4.2	Communication	Clause and Cross Reference amended	3	11.07.2023
47	Cl 7.5.3	Control of documented information	System to change any Documented Information modified.	3	11.07.2023
48	Cl. 8.1	Operational Planning & Control	E-Enabled Processes of Tendering/Finance (SAP/SRM, Reverse Auction, Forward Auction, SAIL Tender website etc.) added	3	11.07.2023
49	Cl 8.3	Financial Control	-Do-	3	11.07.2023
50	Cl 8.5.1	Communication of Anti-Bribery Control	Clause modified due to inclusion of other Plants / Units	3	11.07.2023
51	Cl 9.1	Monitoring measurement, analysis and evaluation	Clause modified due to inclusion of other Plants / Units	3	11.07.2023
52	Cl. 9.3.1	Governing Body and Top Management Review	-Do-	3	11.07.2023

S#	Section/Clau ses/Doc/ Format No.	Changes incorporated in	Reasons for change	New Version No.	Approval Date
53	Cl 9.4	Review by anti-bribery compliance function	-Do-	3	11.07.2023
54	Section 12 & 13	Performance Evaluation and Improvement	Section No. for Performance Evaluation and Improvement previously numbered as 01 corrected as Section ABMS 12 and ABMS 13 respectively.	3	11.07.2023
55	Annexures to ABMS Manual	Annexures	Annexures rearranged and renumbered due to inclusion of other Plants / Units	2	11.07.2023
56	Annexure 1	Addresses of CMO HQ, RO, BSOs, BTSOs, WH, SRMS etc.	Added as Annexure-1	1	11.07.2023
57	Annexure-2	Organisation Charts of the Plants & Units	Organisation Chart of BSL at Annexure-1 and Organisation Chart of Corporate Office at Annexure- 4 previously, brought under Annexure 2 and Organisation charts of other Plants and Units added.	1	11.07.2023
58	Annexure-3	Interaction of Processes at the Plants and Units	Added as Annexure-3	1	11.07.2023
59	Annexure-4	ABMS Documents and Formats	Previously under Annexure-2, modified as Annexure-4. Covering Pages of all the Formats and Documents updated / modified due to addition of other Plants / Units. Other Docs and formats logically modified as given under rows.	2	11.07.2023
60	Document P/ABMS/PRO 1/Ver 1.0	Procedure for ABMS Management	Modified due to addition of other Plants / Units.	2	11.07.2023
61	Document D/ABMS/CMO 1/Ver 1.0	Format for Context Mapping	Updated. Target date revised to Calendar Year Basis instead of Financial Year Wise basis with addition of other Plants and Units.	2	11.07.2023
62	D/ABMS/N&E 01/ VER 1.0	Interested Party Need & Expectations Mapping	Modified due to addition of other Plants / Units.	2	11.07.2023
63	Document D/ABMS/OB 01/Ver 2.0	ABMS Objectives	Revised due to addition of other Plants and Units.	3	11.07.2023

S#	Section/Clau ses/Doc/ Format No	Changes incorporated in	Reasons for change	New Version No.	Approval Date
64	Document D/ABMS/RM 01/Ver 1.0	Risk Assessment Methodology	Revised due to addition of other Plants and Units. List of Sensitive Positions / Areas in SAIL updated/ added.	2	11.07.2023
65	Format F/ABMS/RA 01/Ver 1.0	Risk Assessment Format	No change in the Format. Change in the covering Page regarding "Distribution" due to addition of Plants and Units	2	11.07.2023
66	Document D/ABMS/RM 01/Ver 1.0	Skill Matrix	Amended with addition of skills of Addl. Chief ABMS Officer	2	11.07.2023
67	Document D/ABMS/RR 01/Ver 2.0	Roles & Responsibilities	Amended. Addition of Roles & Responsibilities of Addl. Chief ABMS Officer and modification of Roles & Responsibilities of Compliance Team. Roles & Responsibilities of all uniformly numbered.	3	11.07.2023
68	Format F/ABMS/CL 01/Ver 1.0	Audit Checklist	Modified to update the references of Evidences	2	11.07.2023
69	Format F/ABMS/IA NC 01/Ver 1.0	Non Conformities Report	No change in the Format. Change in the covering Page regarding "Distribution" due to addition of Plants and Units	2	11.07.2023
70	Format F/ABMS/IA NCCA 01/Ver 1.0	Non Conformities Corrective Action Report	No change in the Format. Change in the covering Page regarding "Distribution" due to addition of Plants and Units	2	11.07.2023
71	Format F/ABMS/MR M 01 / Ver 1.0	Management Review Meeting	No change in the Format. Change in the covering Page regarding "Distribution" due to addition of Plants and Units	2	11.07.2023
72	Format F/ABMS/GF 01/Ver 1.0	Format for Declaration of Gift	No change in the Format. Change in the covering Page regarding "Distribution" due to addition of Plants and Units	2	11.07.2023
73	Annexure-5	Documents Referred in the ABMS Manual	Previously Annexure-3 was numbered as Annexure-5	3	11.07.2023
74	Annexure-6	ABMS Policy	Previously Annexure-5 was numbered as Annexure-6	2	11.07.2023

Note: This amendment record is filled up whenever changes are made in this document.

Document Distribution

Section Number : ABMS-03/A

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Date : 11.07.2023

Controlled Copies

Copy No	Copy Holder
1	Top Management for ABMS for the SAIL Plants and Units where ABMS is being implemented.
2	Members of the ABMS Compliance Teams of the SAIL Plants and Units where ABMS is being implemented.
3	Management Representative
4	Employees through Internet Portals of the SAIL Plants and Units

- 1) The Original Hard Copy set with Management Representative will be treated as the Master Copy.
- 2) The Master Copy is stamped as "MASTER COPY" on the reverse of each page.
- 3) Controlled Copy of the ABMS Manual in "PDF Version" will be emailed to the Controlled Copy Holders, except for the Employees, for whom, it will be displayed through Intranet Portals of SAIL Plants and Units.
- 4) Document is "UNCONTROLLED COPY" unless otherwise marked; uncontrolled documents are not subject to upgrade notification.

Abbreviations, Acronyms, Terms & Definitions

Section Number: ABMS-04

Version Number :3.0

Date : 11.07.2023

Abbreviations

ACVO	Additional Chief Vigilance Officer
ABP	Annual Business Plan
ANNEX	Annexure
ASP	Alloy Steels Plant
BIS	Bureau of Indian Standard
BOD	Board of Directors
BSL	Bokaro Steel Limited (Bokaro Steel Plant)
BSP	Bhilai Steel Plant
CET	Centre for Engineering & Technology
CFP	Chandrapur Ferro alloys Plant
CMO	Central Marketing Organisation
CO	Corporate Office
CT	Compliance Team
CVO	Chief Vigilance Officer
DOC	Document
D (F)	Director (Finance)
D(P)	Director (Personnel)
D (C)	Director (Commercial)
D(T, P & RM)	Director (Technical, Projects & Raw Materials)
DU	Designated units of SAIL in which ABMS is being implemented
ED	Executive Director
EMD	Environment Management Division
HoD	Head of the Department
HR	Human Resource
CGM	Chief General Manager
GM	General Manager
SECY	Secretary
IA	Internal Audit
ISO	International Organization for Standardization
ISP	IISCO Steel Plant
MM	Materials Management
MRM	Management Review Meeting
MOU	Memorandum of Understanding
MR	Management Representative
MTI	Management Training Institute
PF	Provident Fund
PO	Purchase Order
PUR	Purchase
QTY	Quantity
RBU	Ranchi Based Units
RDCIS	Research & Development Centre for Iron & Steel

REC	Records
RSP	Rourkela Steel Plant
NC	Non Conformance
NCR	Non Conformance Report
No	Number
QM	Quality Manual
QMS	Quality Management System
SAIL	Steel Authority of India Limited
SOP	Standard Operating Procedure
SL	Serial
SOW	Scope of work
Specs	Specifications
SRU	SAIL Refractory Units
SSO	SAIL Safety organisation
SSP	Salem Steel plant
TMT	Top Management Team
Trng.	Training
Ver	Version

Terms and Definitions: Some of the terms and definitions used in this manual are given here as under.

General

- **Audit** - systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled
- **Auditee** - Individual/ Group/ Organization being audited.
- **Auditor** - Person with the competence to conduct an audit (includes trained internal auditors).
- **Audit Scope:** Extent and range of a given audit
- **Bribery:** Offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non- financial), directly or indirectly , and irrespective of location (s), in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person’s duties.
- **Business Associate:** External party with whom the organisation has, or plans to establish, some form of business relationship.
- **Continual improvement** - recurring activity to increase the ability to fulfil requirements
- **Correction:** Action to eliminate a detected **nonconformity**
- NOTE: Correction can be, for example, **rework** or **re-grade**.
- **Corrective action** - action to eliminate the cause of a detected nonconformity or other undesirable situation
- **Document** –information and its supporting medium
- **Information** - meaningful data
- **Infrastructure** –system of facilities, equipment and services needed for the operation of an organization
- **Interested party** - person or group having an interest in the performance or success of an organization
- **Management** - coordinated activities to direct and control an organization
- **Management system** –system to establish policy and objectives and to achieve those objectives
- **Record** –document stating results achieved or providing evidence of activities performed
- **System** - set of interrelated or interacting elements

- **Top management** - person or group of people who directs and controls an organization at the highest level
- **Work environment** - set of conditions under which work is performed

Terms specific to ISO 37001:2016 ABMS

- **Controlled Copy** -A copy of a document whose Version is communicated to the holder whenever it is carried out
- **Correction:** Action taken to eliminate a detected non-conformity
- **Corrective Action** -Action taken to eliminate the causes of a detected non-conformity or other undesirable situation in order to ensure that the non-conformity does not occur again i.e. prevent recurrence
- **Client Satisfaction** -Client's perception of the degree to which the client's requirements have been fulfilled. Client complaints are a common indicator of low client satisfaction but their absence does not necessarily imply high client satisfaction.
- **Customer:** Person or organization that could or does receive a product or a service that is intended for or required by this person or organization
- **Context of the organization** - Combination of internal and external issues that can have an effect on an organization's approach to developing and achieving its objectives
- **Document:** Information and the medium on which it is contained
- **Documented information** - Information required to be controlled and maintained by an organization and the medium on which it is contained
- **Interested party** - Stakeholder person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity
- **Organization** - Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.
- **Object** - Entity, item, anything perceivable or conceivable
- **Management** - Coordinated activities to direct and control an organization.
- **Mission** - Organization's purpose for existing as expressed by top management
- **Non-Conformity** - Non-fulfilment of a requirement.
- **Process:** - Set of inter-related or interacting activities that use inputs to deliver an intended result.
- **Procedure-** Specified way to carry out an activity or a process.
- **Policy** – Organization's intentions and direction of an organization as formally expressed by its top management
- **Product** - Output of an organization that can be produced without any transaction taking place between SAIL and the customer.
- **Quality** - Degree to which a set of inherent characteristics of an object fulfils requirements
- **Quality management** - Management with regard to quality
- **Quality Policy** - Policy related to quality need or expectation that is stated, generally implied or obligatory
- **Regulatory requirement** - obligatory requirement specified by an authority mandated by a legislative body
- **Risk** - effect of uncertainty
- **Record** - Document stating results achieved or providing evidence of activities performed
- **Strategy** - plan to achieve a long-term or overall objective
- **Statutory requirement** - obligatory requirement specified by a legislative body
- **Service** - Output of an organization with at least one activity necessarily performed between SAIL and the customer
- **Vision** - Organization aspiration of what an organization would like to become as expressed by top management

Introduction & Organization Profile

Section Number: ABMS 05

Version Number :3.0

Date : 11.07.2023

1.0 Introduction:

Steel Authority of India Limited (SAIL) is committed to conducting business ethically and in compliance with all applicable laws and regulations with respect to its operations across India.

This document is an integral part of SAIL's actions aimed at preventing bribery in the conduct of its business operations, referred to as the Anti-Bribery Management System ("ABMS").

This document exhibits SAIL's commitment to meet ABMS requirements.

This document sets out SAIL's ABMS Policy prohibiting bribery, corruption and other improper payments in the conduct of business operations and lists out key responsibilities of SAIL Personnel and Business Partners for ensuring implementation of the Policy.

The key objectives of the ABMS program are to prevent bribery related risk exposures by implementing processes, training and awareness activities that ensure:

- A. Compliance with applicable anti-bribery laws;
- B. Creating awareness about SAIL's emphasis on ethical business practices and its zero-tolerance approach towards conduct that is in breach of ABMS Policy;
- C. Effective Implementation of ABMS by Incidence reporting, investigation and compliance.

2.0 Organization Profile:

Steel Authority of India Limited (SAIL), a Central Public Sector Enterprises (CPSE) is one of the largest steel making companies in India. With production of around 19.409 million tones of Hot Metal, 18.289 Million Tonnes of Crude Steel and Annual Turnover of Rs. 104447 Crores in 2022-23, SAIL is one of the 'Maharatna CPSEs' of the country. SAIL has continuously moved with the times to carve a niche for itself among the leading steel producers of the World.

SAIL Plants together produce the widest spectrum of steel products in the country, covering both flat and long product segments, providing cost-effective and superior quality of products and services.

SAIL has completed a massive expansion plan and increased its crude steel production capacity to 21.4 million tonnes (MT) enabling its steel plants to produce 100% steel through the basic oxygen furnace-continuous casting route and an expanded product mix with a larger proportion of value-added items. A long term strategic plan has been worked out to steer the company towards a target of 50 MT of hot metal production by 2030, thereby meeting the strategic objectives of maintaining leadership position in Indian steel sector and a position amongst the top steel companies globally. SAIL makes its steel available at customers' doorsteps through one of the most extensive warehouse, distributor and dealer networks.

The Government of India owns about 65% of SAIL's equity and retains voting control of the Company. However, SAIL, by virtue of its 'Maharatna' status, enjoys significant operational and financial autonomy. Headquarter of company is located at New Delhi.

SAIL produces iron and steel at five integrated plants (Rourkela Steel Plant, Bhilai Steel Plant, Durgapur Steel Plant, Bokaro Steel Plant, IISCO Steel Plant) and three special steel plants (Alloy Steel Plant, Salem Steel Plant and Visvesvaraya Iron & Steel Plant) located principally in the eastern and central regions of India and situated close to domestic sources of raw materials. SAIL manufactures and sells a broad range of steel products (**Product details are available at SAIL website www.sail.co.in**)

2.1 The brief profile of the Plants and Units of SAIL in which ABMS has been implemented / is being implemented are as under (**Detailed Profiles are available at SAIL website www.sail.co.in**):

i. Corporate Office: The Corporate Office (Head Quarter) of SAIL is situated at Delhi. Chairman, SAIL and other functional Directors of SAIL, i.e., Director (Finance), Director (Personnel), Director (Technical, Raw Materials and Projects), Director (Commercial) and Chief Vigilance Officers, SAIL, operate from the Corporate Office. There are other senior Officers like the Company Secretary, Head of Corporate Communications, Executive Director (Law) and PLO also operate from Corporate Office. The meetings of the SAIL Board are normally held in the Corporate Office. Corporate Office performs all corporate functions, provides guidance and directions to the Plants and Units of SAIL and monitors the operations/ activities of the Plants and Units to achieve the company goals and targets.

ii. RSP: Rourkela Steel Plant (RSP), the first integrated steel plant in the public sector in India, situated at Rourkela, Odisha; produces various flat, tubular and coated steel products. It also produces silicon steels for the power sector and high quality pipes for the oil & gas sector. The plant has a capacity to produce 4.5 Million Tonne (MT) of Hot Metal, 4.2 MT of Crude Steel and 3.9 MT of Saleable Steel.

iii. DSP: Durgapur Steel Plant (DSP), an integrated steel plant of SAIL, situated at Durgapur, West Bengal, is a leading producer of long steel products and is the pioneer in manufacturing and supply of forged Railway Wheels & Axles in the country. The plant has a capacity to produce 2.40 MT of Hot Metal, 2.20 MT of Crude Steel and 2.12 MT of Saleable Steel.

iv. BSP: Bhilai Steel Plant (BSP), an integrated steel plant of SAIL, situated at Bhilai, Chhattisgarh; is India's largest producer & supplier of world class rails for Indian Railways and a major producer of large variety of wide and heavy steel plates and structural steel. The plant also specializes in wire rods and merchant products. The Plant has a production capacity of 7.5 Million Tonnes (MT) of Hot Metal, 7 MT of Crude Steel and 6.56 MT of Saleable Steel.

v. BSL: Bokaro Steel Plant (BSL) - an integrated steel plant of SAIL, situated at Bokaro, Jharkhand; produces flat steel products like Hot Rolled Coils, Hot Rolled Plates, Hot Rolled Sheets, Cold Rolled Coils, Cold Rolled Sheets, Tin Mill Black Plates (TMBP) and Galvanised Plain and Corrugated (GP/GC) Sheets. The plant has an installed capacity to produce 5.25 MT of Hot Metal, 4.655 MT of Crude Steel and 3.780 MT of Saleable Steel.

vi. ISP: Situated at Burnpur, West Bengal, the Indian Iron & Steel Company (IISCO), is one of the oldest integrated steel plants of the country. Initially a subsidiary of SAIL, it amalgamated with SAIL in February 2006 and renamed IISCO Steel Plant (ISP). ISP produces a large number of steel structures and special sections as well as pig iron. The plant pioneered the production of centre-sill Z-section used in the fabrication of wagon and Z-type sheet piling section used in construction of barrages, bridge foundations and other projects. The plant has a capacity to produce 2.70 MT of Hot Metal, 2.50 MT of Crude Steel, 2.39 MT of Saleable Steel and 0.893 MT of pig iron annually.

vii. ASP: Alloy Steels Plant, situated at Durgapur, West Bengal; produces alloy steels like Carbon Constructional Steels, Alloy Constructional Steels, Case Hardening Steels, Die Blocks, Creep Resistant Steels, Spring Steels & High Mn Steels (Hadfield). It also manufactures high impact resistant steels (armour grade steels) for Defence and special steels for Naval application. It also manufactures Stainless Steels including colouring of stainless steel. Currently, the Plant has a capacity to produce around 260000 Tonne of liquid steel and 183500 tonne of saleable steel.

viii. SSP: Salem Steel Plant, situated at Salem, Tamilnadu is a special steel plant of SAIL, producing austenitic, ferritic, martensitic & low-nickel stainless steel in the form of coils & sheets. Steel Melting Shop (SMS) can produce 1,80,000 tonnes of slabs per annum. Hot Rolling Mill (HRM) has an installed capacity of 3,64,000 tonnes per annum of hot rolled stainless steel/carbon steel coils. Cold Rolling Mill (CRM) has an installed capacity of 3,40,000 tonnes per annum of saleable stainless steel coils/sheets. In addition, the plant has stainless steel blanking facility with a capacity of 6,600 tonnes per annum of coin blanks.

ix. CMO: SAIL's Central Marketing Organisation, headquartered at Kolkata, is India's largest industrial marketing set-up. CMO is primarily responsible for marketing of carbon, alloy and special steel products produced by the steel plants of SAIL. CMO's network of 4 Regional Offices, 35 Branch Sales Offices, 37 operational Warehouses and 5 operational Customer Contact Offices function in a synchronised manner to deliver quality SAIL steel to every corner of the country.

International Trade Division (ITD): under CMO looks after export orders for Iron and Steel materials produced at the five integrated steel plants of SAIL viz. Bhilai Steel Plant, Bokaro Steel Plant, Rourkela Steel Plant, Durgapur Steel Plant and IISCO Steel Plant. ITD also monitors the execution of export contracts entered into with the foreign buyers.

Transport & Shipping (T&S): Transport & Shipping is head quartered at Kolkata. T & S department has two regional offices, one at Vishakhapatnam (Southern Region – SR) and the other at Kolkata (Eastern Region-ER). It has Transport & Shipping Offices at Haldia & Kolkata under ER and Paradeep & Vishakhapatnam under SR. T & S is responsible for export and import cargo of SAIL. It ensures fulfilment of export commitments and dispatch of the imported raw like coal, stores machinery to all the SAIL plants units as per their need.

x. CFP: Chandrapur Ferro Alloys Plant, situated at Chandrapur, Maharashtra, has an installed capacity to produce 1,30,000 TPY Silico Manganese. The product range of CFP includes High Carbon Ferro Manganese, Silico Manganese and Medium/Low Carbon Ferro Manganese. The plant plays the role of captive source of Ferro Alloys for SAIL.

xi. SRU: SAIL Refractory Unit (SRU), is one of the largest manufacturers of refractories in India and is a captive source of Refractories for SAIL Plants. Headquartered at Bokaro, Jharkhand;

SRU comprises of following units:

- **SRU, Bhilai**, situated in Bhilai, Chhattisgarh; is engaged in producing the entire range of basic and silica refractories. It also carries out calcination of lime in its rotary kiln, which is further used by Bhilai Steel Plant for iron & steel production. It has an installed capacity of 67,200 tonnes.
- **SRU, IFICO**, also situated in Ramgarh, Jharkhand; has an installed capacity of 42,000 tonnes. The unit's products include a full line of alumino-silicate refractories and various other special products
- **SRU, Bhandaridah**, 40 kms from Bokaro, Jharkhand has an installed capacity of 31,600 tonnes, in manufacturing tap hole mass, trough ramming mass and ultra low cement castables for application in blast furnaces.
- **SRU, Ranchi Road**, situated in Ramgarh, Jharkhand; has the installed capacity of 7,500 tonnes. The unit produces superior quality magnesia carbon bricks.

xii. Ranchi Based Units (RBU):

- **RDCIS:** The Research & Development Centre for Iron & Steel (RDCIS), situated at Ranchi, Jharkhand is the corporate R&D unit of SAIL. It undertakes R&D projects in diverse realms of Iron & Steel Technology under the categories of Plant Performance Improvement (PPI), Product Development (PD), Scientific Investigation and Development (SID), Basic Research (BR) and Technical Services (TS). The major efforts are directed towards cost reduction, quality improvement and value-addition to products of SAIL plants and providing application engineering support to SAIL's products at customers' end. RDCIS also offers technological services to various organizations in the form of Know-how transfer of technologies developed by RDCIS; Consultancy services; Specialized testing services; Contract research; Technology Awareness Programmes etc.
- **CET:** The Centre for Engineering & Technology (CET) situated at Ranchi, Jharkhand; is an in-house "Engineering & Technology Consultant" unit of SAIL. CET provides various range of services for a project from concept to commissioning stages including preparation of feasibility reports, detailed project report, mining plan, drawings, Investment Proposals, Tender Evaluation Report (TER), designer's supervision during erection and commissioning, post commissioning services, etc. CET is also marketing its services to customers in the steel sector outside SAIL.
- **SSO:** SAIL Safety Organization (SSO), situated at Ranchi, Jharkhand, monitors and guides the safety Promotional, fire and Occupational Health Services activities undertaken at different steel Plants/Units/Mines/Stockyards. SSO formulates and prepares appropriate safety policies, procedures, systems, action plans, guidelines etc. and follows up for their implementation and thereby helps in providing accident free work environment. SSO also builds competencies in the area of Safety Management through HR interventions .
- **MTI:** Management Training Institute (MTI), situated at Ranchi, Jharkhand, is an in house training institute of SAIL. MTI organizes customized training programmes and other HR interventions to meet the developmental needs of senior executives of SAIL. The Institute also designs and conducts innovative techno-managerial programmes like Performance Improvement Workshops (PIWs) and Learning from Each Other Workshops (LEO) etc.. MTI also facilitates Corporate Workshops for the Top Management for providing strategic direction to the Company.

xiii. EMD: Environment Management Division (EMD), situated at Kolkata plays a pivotal role in consolidation of the efforts of the plants, mines and units towards environment protection and resource optimization through its multifarious activities involving:

- Proactive interface between the SAIL units and the regulatory agencies,
- Monitoring and assessment,
- Technology dissemination,
- Awareness campaigns and skill up-gradation.

In addition to these, EMD with constant co-operation from plants, mines and units, is paving its way for propagation of EMS linked to ISO 14001 for various shops and units, including warehouses.

xiv. Captive Mines

SAIL has iron ore mines in Jharkhand (Kiriburu, Meghahatuburu, Gua and Chiria) under Bokaro Steel Plant; in Odisha (Bolani, Barsua, Taldih and Kalta) under Rourkela Steel Plant and in Chhattisgarh [Dalli, Rajhara, Kalwarnagur and Rowghat (under development)] under Bhilai Steel Plant. SAIL also has a lime stone mine at Kuteshwar, Madhya Pradesh under Bhilai Steel Plant and Flux mines in Jharkhand (Tulsidamar) under Bokaro Steel Plant.

SAIL also has captive coal mines. Collieries Division under Bokaro Steel Plant oversees the operations of Collieries in Jharkhand (Jitpur, Ramnagore and Tasra) and West Bengal (Ramnagore). Among the 03 (three) operating mines, Chasnalla & Jitpur Colliery are located in Jharia Coalfield, Dhanbad, Jharkhand and produce coking coal while Ramnagore Colliery is located on Raniganj Coalfield which produces non-coking coal. Opencast mine at Tasra is in project stage.

2.3 SAIL Vision:

To be a respected world class corporation and the leader in Indian steel business in quality, productivity, profitability and customer satisfaction.

2.4 SAIL Credo

- We build lasting relationship with customers based on trust and mutual benefit
- We uphold highest ethical standard in conduct of our business
- We create and nurture a culture that supports flexibility, learning and is proactive to change
- We chart a challenging career for employees with opportunities for advancement and rewards
- We value the opportunity and responsibility to make a meaningful difference in people's lives

Scope & Boundary for ABMS

Section Number : ABMS 06

Version Number :3.0

Date : 11.07.2023

3.0 SCOPE

3.1 Application of Anti-Bribery Management System:

In the first phase, SAIL has established, implemented and maintained ABMS activities as per ISO 37001:2016, in its Corporate Office in Delhi and Bokaro Steel Plant in Jharkhand and these two Units received ABMS Certification from M/s Bureau of Indian Standards for a period of three years effective from 1st November 2022. In the 2nd Phase, SAIL is implementing ABMS activities in its other Plants and Units details of which are given below. The Boundary and Scope of ABMS for these Units are as under:

Standard Scope of ISO 37001:2016		
Boundary: SAIL Plants and Units as detailed below.		
Location / Address	SCOPE STATEMENT (covering Product/Services)	Processes Covered
1.0 SAIL Corporate Office (Head Quarter) at <ul style="list-style-type: none"> • Ispat Bhawan, Lodhi Road, New Delhi -110003 • 16th, 18th, 19th & 20th Floor, Core -1, SCOPE Minar, Laxmi Nagar District Centre, Delhi -110092 	Prevention, detection and responding to bribery in management of all corporate functions and in monitoring of operations / activities of all the Plants / Units of SAIL.	<ul style="list-style-type: none"> • Board & Company Affairs • Finance & Accounts • Personnel & Administration • Parliament Cell • Materials Management • Import of Coking Coal • Business Planning • Operations Directorate • Projects Directorate • Corporate Affairs • CRMG • Ent. Risk Management • C&IT • Law • Internal Audit • Vigilance

<p>2.0 Rourkela Steel Plant (RSP), Rourkela -769001, Odisha</p> <p>Mines under RSP:</p> <ul style="list-style-type: none"> • Barsua Iron Mines, Tensa, Sundargarh, Odisha-770042 • Bolani Ores Mines, Bolani, Keonjhar, Odisha-758037 <p>3.0 Bokaro Steel Plant (BSL), Bokaro Steel City- 827001, Jharkhand.</p> <p>Mines /Collieries under BSL:</p> <ul style="list-style-type: none"> • Kiriburu Iron Ore Mines Kiriburu General Office Kiriburu, West Singhbhum Jharkhand - 833222 • Meghahatuburu Iron Ore Mines Meghahatuburu General Office Kiriburu, West Singhbhum Jharkhand - 833223 • Gua Ore Mines Gua General Office Gua, West Singhbhum Jharkhand - 833213 • Manoharpur Ore Mines Manoharpur General Office Chiria, West Singhbhum Jharkhand – 833106 • SAIL Collieries Division, Chasnalla, Dhanbad, Jharkhand. PIN: 828135 <p>4.0 Bhilai Steel Plant (BSP, Bhilai - 490001, Chhattisgarh.</p> <p>Mines under BSP:</p> <ul style="list-style-type: none"> • Iron Ore Complex (IOC), Dalli Rajhara SAIL-BSP At P.O. Rajhara Dist: Durg, Chhattisgarh – 491228 • Nandini Limestone Mines SAIL-BSP At P.O. Nandini 	<p>Prevention, detection and responding to bribery in activities involved in mining and production of various iron and steel products.</p>	<ul style="list-style-type: none"> • Production Planning • Production/ Operations • Engineering • Maintenance • Contracts • Vendor Registration • Procurement • Inspection & Stores • Material Recovery • Quality Labs/ Material Testing • Plant Marketing • Despatch • Finance • Personnel • Internal Audit • MIS • Projects • Town Admin • Public Relations • Safety • Vigilance • Medical & Health Services • Mines • Collieries in case of BSL
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<p>Dist: Durg, Chhattisgarh – 490036</p> <ul style="list-style-type: none"> • Hirri Dolomite Mines SAIL-BSP At P.O. Hirri Dist: Bilaspur, Chhattisgarh – 495222 • Kuteshwar Limestone Mines SAIL-BSP Kuteshwar At P.O. Gairtalai, P.S- Barhi Distt: Katni, Madhya Pradesh - 483770 		
<p>5.0 Durgapur Steel Plant (DSP), Durgapur -713203, West Bengal</p> <p>6.0 IISCO Steel Plant (ISP), Burnpur -713325, Bardhman, West Bengal</p>	<p>Prevention, detection and responding to bribery in activities involved in production of various iron and steel products.</p>	<ul style="list-style-type: none"> • Production Planning • Production/ Operations • Engineering • Maintenance • Contracts • Vendor Registration • Procurement • Inspection & Stores • Material Recovery • Quality Labs/ Material Testing • Plant Marketing • Despatch • Finance • Personnel • Internal Audit • MIS • Projects • Town Admin • Public Relations • Safety • Vigilance • Medical & Health Services

<p>7.0 Alloy Steels Plant (ASP), Durgapur -713208, West Bengal</p> <p>8.0 Salem Steel Plant (SSP), Salem - 636013 , Tamilnadu</p>	<p>Prevention, detection and responding to bribery in activities involved in production of alloy & special steels</p> <p>Prevention, detection and responding to bribery in activities involved in production of Cold Rolled Stainless Steel and Hot rolled Stainless Steel / Carbon Steel</p>	<ul style="list-style-type: none"> • Production Planning • Production/ Operations • Maintenance • Contracts • Vendor Registration • Procurement • Inspection & Stores • Quality Labs/ Material Testing • Plant Marketing • Despatch • Finance • Personnel • Internal Audit • Projects • Town Admin • Public Relations • Vigilance • Safety • Medical & Health Services
<p>9.0 Central Marketing Organisation (CMO)- Head Quarter at Kolkata, West Bengal. Addresses of Head Quarter, Regional Offices, International Trade Division, Branch Sales Offices, Ware Houses, Sales Resident Managers, Branch Transport & Shipping Offices etc. covered under ABMS is at Annexure-1, to this Manual)</p>	<p>Prevention, detection and responding to bribery in activities involved in marketing and sales of iron & Steel Products produced by SAIL, export of iron and steel produced by SAIL and logistics for export and import cargo of SAIL.</p>	<ul style="list-style-type: none"> • Marketing & Sales • Marketing Services/ Warehouses • Plant Marketing • Application Engineering • Market Analysis • Commercial • International Trade Division • Finance • Personnel • Internal Audit • Public Relations • Vigilance • Contract Cell • Law • C&IT • Transport & Shipping (Logistics & Infrastructure) • Rail Movement
<p>10.0 Chandrapur Ferro Alloys Plant (CFP), MUL Road, Chandrapur-442401, Maharashtra</p>	<p>Prevention, detection and responding to bribery in activities involved in production of Ferro Alloys.</p>	<ul style="list-style-type: none"> • Personnel & Administration • Finance & Accounts • Materials Management

		<ul style="list-style-type: none"> • Contract Cell • Marketing • Power Plant • Projects • Production • Safety • Maintenance • Quality Labs/ Material Testing • Vigilance
<p>11.0 SAIL Refractory Units (SRU)</p> <ul style="list-style-type: none"> • Head Office : SAIL Refractory Unit Indira Gandhi Marg, Sector-IV Bokaro Steel City– 827004, Jharkhand • Bhandaridah Unit : SAIL Refractory Unit, Bhandaridah, Distt: Bokaro (Jharkhand) • Ranchi Road Unit : SAIL Refractory Unit, Ranchi Road, Distt: Ramgarh (Jharkhand) • IFICO Unit : SAIL Refractory Unit, IFICO, Distt: Ramgarh (Jharkhand) • Bhilai Unit : SAIL Refractory Unit, Bhilai, Distt: Durg, Chhattisgarh 	<p>Prevention, detection and responding to bribery in activities involved in production of Refractory.</p>	<ul style="list-style-type: none"> • Personnel & Administration • Finance & Accounts • Materials Management • Contract Cell • Marketing & Services • Production • Safety • Maintenance • Quality Labs/ Material Testing • Vigilance
<p>12.0 Ranchi Based Units (RBU)</p> <ul style="list-style-type: none"> • Research & Development Centre for Iron & Steel (RDCIS), Doranda, Ranchi-834002, Jharkhand 	<p>Prevention, detection and responding to bribery in undertaking R&D Projects for Performance improvement of SAIL Plants & Units, product development, scientific investigation & development and Technical Services</p>	<ul style="list-style-type: none"> • Personnel & Administration, Finance & Accounts, • Communication, Internal Audit • Vigilance <p>Common for the 4 RBUs.</p> <p>Other Deptt. at RBU:</p> <p>RDCIS:</p> <ul style="list-style-type: none"> • Steel Area • Automation &

<ul style="list-style-type: none"> Centre for Engineering & Technology (CET), Doranda, Ranchi-834002, Jharkhand 	<p>Prevention, detection and responding to bribery in providing technical solution for all project needs of SAIL Plants and Units.</p>	<p>Engineering Area</p> <ul style="list-style-type: none"> Iron Area Product Area Rolling Area Coal, Coke & Energy and Environment Area Materials Management <p>CET:</p> <ul style="list-style-type: none"> Business Excellence Contract & Commercial and Inter Plant Standardisation in Steel Industry Civil & Structural Coal, Coke & Chemical Electrical Iron & Sinter Mechanical Computerisation & Information Technology Process Control & Automation Projects- Cost Techno-Economics Projects-Project Formulation & Coordination Raw Materials Refractory Rolling Mills Steel Utility & Services
<ul style="list-style-type: none"> SAIL Safety Organisation (SSO), Doranda, Ranchi-834002, Jharkhand 	<p>Prevention, detection and responding to bribery in formulating and preparing safety policies, procedures, systems, guidelines etc and their implementation in SAIL Plants / Units.</p>	<p>SSO – One Dept.</p>
<ul style="list-style-type: none"> Management Training Institute (MTI), Doranda, Ranchi-834002, Jharkhand 	<p>Prevention, detection and responding to bribery in designing and delivering HRD interventions for providing</p>	<p>MTI-</p> <ul style="list-style-type: none"> HRD Academics Information

	management education and training to SAIL Executives.	Technology <ul style="list-style-type: none"> • Maintenance • Administration & Hospitality
13.0 Environment Management Division, SAIL House, 3 rd Floor, 50, Jawaharlal Nehru Road, Kolkata - 700071, West Bengal.	Prevention, detection and responding to bribery in monitoring and facilitating Environment Management and Pollution Control Activities of SAIL Plants.	EMD- One Dept. Environment Management

Context of the Organization

Section Number : ABMS 07

Version Number :3.0

Date : 11.07.2023

4. Context of the organization:

4.1 Understanding SAIL and its Context

SAIL has established a System to determine external and internal issues that are relevant to its purpose and that affect its ability to achieve the objectives of its anti-bribery management system through SWOT Assessment. These issues include, without limitation, the following factors:

- a) the size, structure and delegated decision-making authority of the organization;
- b) the locations and sectors in which SAIL operates or anticipates operating;
- c) the nature, scale and complexity of the organization's activities and operations;
- d) the organization's business model;
- e) the entities over which SAIL has control and entities which exercise control over
- f) the organization's business associates;
- g) the nature and extent of interactions with public officials;
- h) applicable statutory, regulatory, contractual and professional obligations and duties.

Cross Reference:

- **Context Mapping/SWOT Assessment [Annexure-4, D/ABMS/CM 01/Ver 2.0 dated 11.07.2023]**

4.2 Understanding the needs and expectations of stakeholders

SAIL has established a system to determine the internal and external interested parties, the relevant requirements of these interested parties and address the same along with responsibilities of SAIL officials.

Cross Reference:

- **Interested Party Needs & Expectations Mapping [Annexure- 4, D/ABMS/N&E 01/Ver 2.0 dated 11.07.2023]**

4.3 Determining the scope of the anti-bribery management system:

In the first phase, SAIL has established, implemented and maintained ABMS activities as per ISO 37001:2016, in its Corporate Office in Delhi and Bokaro Steel Plant in Jharkhand and these two Units received ABMS Certification from M/s Bureau of Indian Standards for a period of three years effective from 1st November 2022. In the 2nd Phase, SAIL is implementing ABMS activities as per

ISO 37001:2016 in its other Plants and Units, for which, the SCOPE and Boundary of anti-bribery management system are defined under Para 3.1 of this Manual.

4.4 Anti-Bribery Management System:

SAIL has established, documented, implemented, maintained, reviewed and, where necessary improved an anti-bribery management system, including the processes needed and their interactions, in accordance with the requirements of this document.

Cross Reference:

- **Interaction of Processes [Annexure-3]**

4.5 Bribery Risk Assessment

4.5.1 SAIL has established a System to undertake bribery risk assessment(s) in respect of ABMS, which:

- a) Identifies the bribery risks SAIL might reasonably anticipate, given the factors listed in clause no. 4.1
- b) analyses, assesses and prioritizes the identified bribery risks;
- c) evaluates the suitability and effectiveness of the organization's existing controls to mitigate assessed bribery risks.

4.5.2 SAIL has established criteria for evaluating its level of bribery risk, which shall take into account the organization's policies and objectives.

4.5.3 The bribery risk assessment shall be done for high risk Sensitive Departments/ sections. For other low risk Departments/ sections, it shall be done as and when required as per advice of the Governing Body/Top Management/Compliance Team/HODs.

Risk assessment shall also be done in the event of a significant change to the structure or activities of the organization and as and when required as per advice of the Governing Body and Top Management, Customers and Stakeholders etc..

Bribery Risk Assessment shall be reviewed during Management Review Meeting

4.5.4 SAIL shall retain documented information that demonstrates that the bribery risk assessment has been conducted and used to design or improve the anti-bribery management system.

Cross Reference:

- Risk Assessment Methodology [**Annexure-4, D/ABMS/RM 01/Ver 2.0 dated 11.07.2023**]
- Risk Assessment format [**Annexure-4, F/ABMS/RA 01/Ver 2.0 dated 11.07.2023**]

Leadership

Section Number : ABMS 08

Version Number :3.0

Date: 11.07.2023

5.0 Leadership

5.1 Leadership and commitment

5.1.1 Governing Body

Board of Directors of SAIL, the Governing Body of SAIL, demonstrates leadership and commitment with respect to the anti- bribery management system by:

- a) approving the organisation's anti bribery policy;
- b) ensuring that the organization's strategy and anti-bribery policy are aligned;
- c) at planned intervals, receiving and reviewing information about the content and operation of the organization's anti-bribery management system;
- d) requiring that adequate and appropriate resources needed for effective operation of the anti-bribery management system are allocated and assigned;
- e) exercising reasonable oversight over the implementation of the organization's anti-bribery management system by top management and its effectiveness.

Cross Reference:

- **List of Governing Body Members**
- **Minutes of Governing Body Meeting**

5.1.2 Top Management

Besides the Governing Body, the Chairman, SAIL has identified the Top management Teams for ABMS for the SAIL Plants and Units, who demonstrate leadership and commitment with respect to the anti-bribery management system by:

- a) ensuring that the anti-bribery management system, including policy and objectives, is established, implemented, maintained and reviewed to adequately address the organization's bribery risks;
- b) ensuring the integration of the anti-bribery management system requirements into the organization's processes;
- c) deploying adequate and appropriate resources for the effective operation of the anti-bribery management system;
- d) communicating internally and externally regarding the anti-bribery policy;
- e) communicating internally the importance of effective anti-bribery management and of conforming to the anti-bribery management system requirements;
- f) ensuring that the anti-bribery management system is appropriately designed to achieve its objectives;

- g) directing and supporting personnel to contribute to the effectiveness of the anti-bribery management system;
- h) promoting an appropriate anti- bribery culture within the organization;
- i) promoting continual improvement;
- j) supporting other relevant management roles to demonstrate their leadership in preventing and detecting bribery as it applies to their areas of responsibility;
- k) encouraging the use of reporting procedures for suspected and actual bribery;
- l) ensuring that no personnel will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the organization's anti-bribery policy, or for refusing to engage in bribery, even if such refusal can result in SAIL losing business (except where the individual participated in the violation);
- m) at planned intervals, reporting to the governing body on the content and the operation of the anti-bribery management system and the allegations of serious or systematic bribery.

Cross Reference:

➤ **Office Order for Top Management of the Plants and Units**

5.1.3 Nodal Officer for ABMS: Vigilance Department of SAIL is facilitating implementation and maintenance of ABMS in SAIL. The Chief Vigilance Officer (CVO), SAIL has been authorized by Chairman, SAIL to act as the Nodal Officer for implementation of ABMS in SAIL. CVO is the Head of SAIL Vigilance and is responsible for undertaking the activities pertaining to preventive vigilance, proactive vigilance, punitive vigilance and establishing a sound vigilance network. He is also responsible for quality services in the Vigilance set up of the Organization. He reports to Chairman, SAIL.

5.1.4 MIDDLE MANAGEMENT:

COMPANY SECRETARY:

The Secretary is acting in this capacity to the Board of Directors of SAIL. He is responsible for all Board and Company Affairs of SAIL. He reports to the Director (Finance).

5.1.5 MANAGEMENT REPRESENTATIVE (ABMS): Chairman, SAIL has authorized CVO, SAIL to appoint a Management Representative (MR) for ABMS. Based on annual internal audit for ABMS, MR is responsible for reporting on the performance of ABMS in SAIL Plants and Units to CVO, SAIL as a basis for improvement of Systems & Procedures for ABMS. He is also responsible for liaising with external certification body on behalf of the Management.

5.1.6 Addl. Chief ABMS Officer: The Additional Chief Vigilance Officers (ACVOs) of the SAIL Plants and Units and CGM/HOD of Corporate Vigilance have been designated as the Addl. Chief ABMS Officer for their respective Plant / Unit. They are responsible for coordination of all efforts with other Deptts. for implementation and maintenance of ABMS in their Plant and Unit.

Cross Reference:

- Roles & Responsibilities [**Annexure-4, D/ABMS/RR 01/Ver. 3.0 dated 11.07.2023**]

5.1.7 HOD: HOD means the officer designated to work as Head of the Department of the various Departments of the Plants and Units of SAIL. HOD is responsible for the quality of work falling under their respective domain and to deal with the issues related thereto for the development and implementation of process/procedures/solutions w.r.t. ABMS.

5.1.8 EMPLOYEES: All Employees of SAIL understand the importance and requirements of ABMS of SAIL. All Employees of SAIL shall abide by all the requirements of ABMS, report to the Competent Authority / CVO / ACVO if any ABMS related Non Compliance is identified.

Cross Reference:

- Organization Charts [**Annexure- 2**]
- Roles & Responsibilities [**Annexure-4, D/ABMS/RR 01/Ver. 3.0 dated 11.07.2023**]

5.2 Anti-bribery policy:

The SAIL Board, the Governing Body, has approved the “Anti Bribery Management Policy (Vision Statement) of SAIL and Chairman, SAIL has issued the same as under:

“SAIL is committed to be a respected world class corporation and the leader in Indian steel business in quality, productivity, profitability, customer satisfaction and, will carry out all its activities in a manner that ensures effective Anti Bribery Management System in the organisation.

SAIL is committed to achieve continual improvement of its ‘Anti-Bribery Management System (ABMS)’ through:

- ✓ Identification of Contexts, Risks & Opportunities on Anti-Bribery in the organization
- ✓ Identification of needs & expectations of internal & external interested parties
- ✓ Compliance with applicable Anti-Bribery Laws
- ✓ Establishing a Management System which prohibits bribery in the Organisation while complying with all applicable legal requirements
- ✓ Establishing a Management System that encourages raising concerns in good faith, or on the basis of a reasonable belief in confidence, without fear of reprisal
- ✓ Establishing a Management System explaining the authority and independence of the Anti-Bribery Compliance Function
- ✓ Establishing a Management System explaining the consequences of not complying with the Anti-Bribery Policy.
- ✓ Establishing a System for setting, reviewing and achieving Anti-Bribery Objectives.
- ✓ Involvement of & contribution from all Interested Parties (e.g. employees, stakeholders and business associates)

SAIL is also committed to review the effectiveness of this Policy periodically”.

The anti-bribery policy (bi lingual in English and Hindi) is made available on SAIL Website, SAIL Tender Website. The Policy is also made available in the Intranet Portals of SAIL Plants and Units, wherever existing, for all employees. The Document is issued under the signature of Chairman, SAIL.

Cross Reference:

- Anti Bribery Management Policy (Vision Statement) of SAIL - **Annexure – 6.**
- Minutes of the SAIL Board

5.3 Organizational roles, responsibilities and authorities

5.3.1 Roles and responsibilities

Top management of SAIL have overall rights for the implementation of, and compliance with, the anti bribery management system, as described in 5.1.2. Top Management, Compliance Teams, HODs, Employees etc. have well defined roles, responsibilities and authorities in respect of ABMS.

Cross Reference:

- Organization Charts [**Annexure- 2**]
- Roles & Responsibilities [**Annexure-4, D/ABMS/RR 01/Ver. 3.0 dated 11.07.2023**]

5.3.2 Anti-bribery compliance function

Top management has established a system to assign to an anti-bribery management system;

- a) overseeing the design and implementation by SAIL of the anti-bribery management system;
- b) providing advice and guidance to personnel on the anti-bribery management system and issues relating to bribery;
- c) ensuring that the anti-bribery management system conforms to the requirements of this document;
- d) reporting on the performance and compliance functions of the anti-bribery management system to the governing body and Top Management through CVO, SAIL.

The SAIL Board, has authorised Chairman, SAIL or any other person(s) nominated by Chairman, SAIL to take any necessary action to implement ABMS in SAIL in line with ISO 37001:2016.

Chairman, SAIL has nominated the Top Management for ABMS for the Plants and Units of SAIL.

For the individual Plants and Units of SAIL Compliance Teams have been constituted for the above.

Cross Reference:

- Office Orders for Compliance Teams
- Roles & Responsibility of Compliance Team [**Annexure-4, D/ABMS/RR 01/Ver 3.0 dated 11.07.2023**]

5.3.3 Delegated decision-making

SAIL has established and maintained a decision-making process or set of controls which requires that the decision process and the level of authority of the decision makers are appropriate and free of actual or potential conflicts of interest. Top management has ensured that these processes are reviewed periodically as part of its role and responsibility for implementation.

Cross Reference:

- Delegation of Power
- SAIL CDA Rules 1977 amended from time to time.

Planning

Section Number : ABMS 09

Version Number :3.0

Date : 11.07.2023

6.0 Planning

6.1 Actions to address risks and opportunities

While planning for the anti-bribery management system, SAIL has considered the issues referred to in 4.1, the requirements referred to in 4.2. the risks identified in 4.5 and opportunities for improvement that need to be addressed to:

- a) give reasonable assurance that the anti-bribery management system can achieve its objectives;
- b) prevent, or reduce, undesired effects relevant to the anti-bribery policy and objectives;
- c) monitor the effectiveness of the anti-bribery management system;
- d) achieve continual improvement.

Cross Reference:

- Risk Assessment Methodology [Annexure-4, D/ABMS/RM 01/Ver 2.0 dated 11.07.2023]

6.2 Anti-bribery objectives and planning to achieve them

SAIL has established anti-bribery management system objectives at relevant functions and levels with the approval of CVO. SAIL has established a System to retain documented information on the anti bribery management system objectives.

The ABMS Objectives are set on Calendar Year basis. The fulfilment of targets would be reviewed at the end of each Calendar Year and if required, the targets for next year may be revised through issuance of Amended ABMS Manual.

Cross Reference:

- ABMS Objectives [Annexure- 4, D/ABMS/OB 01/Ver 3.0 dated 11.07.2023]

Support

Section Number : ABMS 10

Version Number :3.0

Date : 11.07.2023

7 Support

7.1 Resources

SAIL has established a system to determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the anti-bribery management system.

Cross Reference:

- Financial Allocation for ABMS
- Vigilance Deptts. of all SAIL Plants and Units
- ABMS Compliance Teams
- ABMS Internal Auditors & Resource Persons

7.2 Competence

7.2.1 General

SAIL has established a system to prepare a ABMS Skill Matrix to determine the necessary competence of person(s) doing work under its control that affects its anti-bribery performance ; and wherever required, regular training / awareness will be given to enhance competencies :

Cross Reference:

- ABMS Skill Matrix (**Annexure 4, Doc No. D/ABMS/SM 01/Ver 2.0 Dated 11.07.2023**)
- Training & Awareness

7.2.2 Employment process

7.2.2.1 In relation to all of its personnel, SAIL has implemented procedures such that:

- a) conditions of employment require personnel to comply with the anti-bribery policy and anti-bribery management system, and give SAIL the right to discipline personnel in the event of non-compliance ;
- b) within a reasonable period of their employment commencing personnel receive a copy of, or are provided with access to, the anti-bribery policy and training in relation to that policy;
- c) SAIL has procedures which enable it to take appropriate disciplinary action against personnel who violate the anti-bribery policy or anti-bribery management system;
- d) personnel will not suffer retaliation, discrimination or disciplinary action (e.g. by threats, isolation, demotion, preventing advancement, transfer, dismissal, bullying, victimization, or other forms of harassment) for:

1) refusing to participate in, or turning down, any activity in respect of which they have reasonably judged there to be a more than low risk of bribery that has not been mitigated by the organization; or

2) concerns raised or reports made in good faith, or on the basis of a reasonable belief, of attempted, actual or suspected bribery or violation of the anti-bribery policy or the anti-bribery management system (except where individual participated in the violation).

7.2.2.2 In relation to all positions which are exposed to more than a low bribery risk, as determined in the bribery risk assessment and to the anti-bribery compliance function, SAIL shall implement procedures which provide that:

a) due diligence is conducted on persons before they are employed, and on personnel before they are transferred or promoted by SAIL, to ascertain as far as is reasonable that it is appropriate to employ or redeploy them and that is reasonable to believe that they will comply with the anti-bribery policy and anti-bribery management system requirements;

b) performance bonuses, performance targets and other incentivizing elements of remuneration are reviewed periodically to verify that there are reasonable safeguards in place to prevent them from encouraging bribery;

Cross Reference:

- SAIL CDA Rules 1977 amended from time to time.
- SAIL Personnel Manual including HR Policy & Procedures
- Background / Document Verification of selected candidates
- Vigilance Clearance Policy
- Agreed/ ODI Lists
- Vigil Mechanism
- PIDPI Resolution.

7.3 Awareness and training

SAIL has established a system to provide adequate and appropriate anti-bribery awareness and training to personnel. Such trainings shall address the following issues, as appropriate, taking into account the results of the bribery risk assessment:

a) the organization's anti-bribery policy, procedures and anti-bribery management system and their duty to comply;

b) the bribery risk and the damage to them and SAIL which can result from bribery;

c) the circumstances in which bribery can occur in relation to their duties and how to recognize these circumstances;

d) how to recognize and respond to solicitations or offers of bribes;

e) how they can help prevent and avoid bribery and recognize key bribery risk indicators;

f) their contribution to the effectiveness of the anti-bribery management system, including the benefits of improved anti-bribery performance and of reporting suspected bribery;

- g) the implications and potential consequences of not conforming with the anti-bribery management system requirements;
- h) how and to whom they are able to report any concerns;
- i) Information on available training and resources.

Personnel are provided with anti-bribery awareness and training on a regular basis (at planned intervals determined by the organization), as appropriate to their roles the risks of bribery to which they are exposed and any changing circumstances. The awareness and training programmes shall be periodically updated as necessary to reflect relevant new information.

Taking into account the bribery risks identified, SAIL shall create anti-bribery awareness for its business associates acting on its behalf or for its benefit, and which could pose more than a low bribery risk to the organization.

SAIL retains documented information on the training procedures, the content of the training, and when and to whom it was provided.

Cross Reference:

- Training Record

7.4 Communication

7.4.1 SAIL has established a System to determine the internal and external communications relevant to the anti-bribery management system.

7.4.2 The anti-bribery policy is made available to all the organization’s personnel and business associates, by communicating to both personnel and business associates through the organization’s internal and external communication channels, as appropriate.

INTERNAL COMMUNICATION:

What	When	With whom	How	Who
ABMS Policy (Vision Statement)	Once gets approved	Employees / Interested Parties	SAIL Website, SAIL Tenders Website, Intranet Portals of SAIL Plants and Units	SAIL Vigilance
ABMS Manual	Once gets approved	Employees	Intranet Portals of SAIL Plants and Units	SAIL Vigilance
Importance of effective ABMS	As per Training / Awareness Plan	Employees	Training / Awareness	SAIL Vigilance/ HR Team
ABMS Objectives	Every year, once gets approved	Concerned Employees	As a part of the ABMS Manual	SAIL Vigilance / Concerned Deptt.
Responsibilities and Authority	As and when required	Employee	Training / Awareness	SAIL Vigilance/ HR
Anti Bribery Awareness	-	Employees	Anti Bribery Posters	SAIL Vigilance /PR
Internal Customer Feedback (ABMS related)	On receipt of the Feedback (ABMS related)	Concerned Deptt.	Written communication	Vigilance Deptt. / Concerned Deptt.

EXTERNAL COMMUNICATION

What	When	With whom	How	Who
ABMS Policy (Vision Statement)	Once gets approved	Business Associates	SAIL Website, SAIL Tenders Website	SAIL Vigilance
ABMS Ant- Bribery Commitments	Processing/ Award of Tenders/ Contracts	Supplier/ Service Providers (External Provider / Business Associate)	Tender Terms /Purchase order/ Agreement	Concerned Process Owner
Anti Bribery Awareness	-	External Provider / Business Associate	Anti Bribery Posters/ Notices in SAIL Website, SAIL Tenders Website	SAIL Vigilance /PR
External Customer Feedback (ABMS related)	On receipt of the Feedback (ABMS related)	Concerned Deptt.	Grievance Redressal / Written Communication	Personnel Deptt./SAIL Vigilance

Cross Reference:

- ABMS Manual
- Complaint Handling Policy of SAIL Vigilance
- Training / Awareness Plan
- Intranet Portal of SAIL Plants /Units
- Tender Document / SAIL Tender Website/ SAIL Website

7.5 Documented Information

7.5.1 General

The organization's anti-bribery management system includes:

- a) documented information required by this document;
- b) documented information determined by SAIL as being necessary for the effectiveness of the anti-bribery management system.

7.5.2 Creating and updating

When creating and updating documented information SAIL ensures appropriate:

- a) identification and description (e.g. a title, date, reference number);
- b) format (e.g. language, software version, graphics) and media (e.g. paper, electronic);
- c) review and approval for suitability and adequacy.

7.5.3 Control of documented information

For the control of documented information, SAIL has established a system to address the following activities, as applicable:

- distribution, access, retrieval and use;
- storage and preservation, including preservation of legibility;
- control of changes (e.g. version control);
- retention and disposition.

Documented information of external origin determined by SAIL to be necessary for the planning and operation of the anti-bribery management system shall be identified as appropriate, and controlled.

Activity	System to control activities
Types of Documented Information	<p>The organization has established following documented information</p> <ul style="list-style-type: none"> ➤ ABMS Manual (ABMSM) ➤ ABMS Documents (SAIL Vigilance Manual, Vigilance QMS Manual and Procedures, SAIL CDA Rules 1977 etc. as detailed Clause 8.1 below) ➤ Formats (F) ➤ Procedure (P) ➤ Document (D)
Document Identification	<p>Identification of the ABMS documents are done through (a) Document Title (b) Document Number. Each document is having document title and unique identification number. Following method is applied for Document Numbering -</p> <p>1.Manual - ABMSM / SAIL (type of Document / Organization)</p> <p>2.Other Documents -</p> <p>abbreviation of nature of documented information (X) / abbreviation of Management System (Y) / abbreviation of the document title (Z) / number (A)</p> <p>Example - Title: Context Mapping; Number: D/ABMS/CM 02 X = D stands for Document Y = ABMS stands for Anti Bribery Management System Z = CM Stands for Context Mapping A = serial number of the document</p> <p>3. Formats -</p> <p>abbreviation of nature of documented information (X) / abbreviation of Management System (Y) / abbreviation of the document title (Z) / number (A)</p> <p>Example - Title: Gift Record; Number: F/ABMS/GR 02 X = F stands for Format Y = ABMS stands for Anti Bribery Management System Z = GR Stands for Gift Record A = serial number of the document</p>
Document Preparation	<p>The preparation of documented information, against various requirements to demonstrate the management system compliance will be done by the HODs/MR.</p>
Document Review and Approval	<p>SAIL Board has approved the ABMS Policy (Vision Statement) and has authorised Chairman, SAIL or any other person nominated by Chairman to carry out any activities to implement ABMS in SAIL. CVO, SAIL has been nominated by Chairman as the Nodal Officer for ABMS and has also been authorised to approve the ABMS Manual and Procedures. The ABMS Documents/ procedures/ formats etc. will be reviewed from time to time and Amendments, if any proposed by the Compliance Team/HODs/MR will be considered and approved by CVO, SAIL/Competent Authority.</p>
Document change control	<p>As and when there is a need to change any documented information, the Compliance Team/HODs/MR will propose amendment to ABMS Documents/ procedures/ formats etc.. The proposed amendment will be reviewed and approved by CVO, SAIL /Competent Authority. The Document Amendment History will be</p>

	updated, after making the change.
System to change any Documented Information	The ABMS Compliance Teams shall assess on a continual basis whether the anti-bribery management system is, (a) adequate to manage effectively the bribery risks faced by the organization and (b) being effectively implemented. Once a year, the Compliance Teams shall report on the adequacy and implementation of the ABMS and audits conducted for ABMS; to their Top Management for ABMS. Compliance Teams also shall suggest changes, if any, required in the Systems and Procedures for ABMS. Compliance Team/HODs/MR may suggest changes, if any, required in the Systems and Procedures for ABMS, for consideration of CVO, SAIL / Competent Authority. The Amendments will be reviewed and approved by CVO/ Competent Authority. On receipt of the approval, necessary change will be done by the MR. The old copy will be declared OBSOLETE and replaced with modified copy. Controlled Copy of the revised ABMS Manual in “Read only PDF Version” will be emailed to the Controlled Copy Holders and a copy will be uploaded on the SAIL Intranet Portal for the employees.
Document Identification and Traceability	(a) By assigning unique title to each document, the document identification is controlled; (b) Through filing system (hard copy and or soft copy), document traceability is controlled.
Control of Document Revision status	When any documented information is prepared and issued first time, the version number is allotted as 1.0. As soon as any change is made, the version status gets changed serially 2.0, 3.0 --- so on.
Control of Hard copy Documented information	Hard copy of documented information is kept with proper identification and traceability.
Control of Soft copy documents	Soft copy of documented information is maintained in the Computer (Desktop / Laptop). Back up is taken in the external hard disk at regular intervals. Soft copy documented information are maintained in respective Folders with proper Identification and Traceability.
Distribution of Documented Information	(a) The approved and updated Hard Copy Documented Information is maintained by MR. (b) The approved, updated and ‘Read Only PDF version’ Controlled Copy of Documented Information will be emailed to the Controlled Copy Holders and a copy will be uploaded on the SAIL Intranet Portal for the employees.
Type of Documents	The original approved and updated set of documents is marked as “ Master Copy ”. The old documents are marked as “ Obsolete Copy ” (which may be retained for future reference purpose with clear identification as ‘For Reference Only’ or disposed of through shredding /other suitable process).
Retention and Disposition	The documents are normally retained for 3 years or more depending on the management decision, to keep longer for reference purpose. They are disposed by crushing or breaking or deleting or by rewriting, after the retention period. After the retention period these are shifted to record room and disposed by shredding /other suitable means .

Documented information of external origin determined by SAIL to be necessary for the planning and operation of the anti-bribery management system shall be identified as appropriate, and controlled.

Cross Reference :

- **Document/Procedure/Format related to ABMS [Annexure 4 to ABMS Manual]**
- **List of Documents referred in the ABMS Manual [Annex-5 to ABMS Manual]**

Operation

Section Number : ABMS 11

Version Number :3.0

Date : 11.07.2023

8 Operation

8.1 Operational Planning and Control

SAIL has implemented ABMS in the designated Plants and units of SAIL with Vigilance Department being the nodal agency for implementation of ABMS. ABMS has been implemented through the following mechanism / Documented Information:

- i. 'SAIL CDA Rules 1977' and 'Standing Order for Non Executive Employees of Bokaro Steel Plant' as amended from time to time – To define code of conduct for employees, to define gift policy, to address conflict of interest and to initiate disciplinary proceedings in case of misconduct.
- ii. Vigilance Manual of the Central Vigilance Commission (CVC) 2021 – Provides guidelines for all vigilance activities like processing of complaints, disciplinary proceedings, preventive vigilance, etc.
- iii. QMS Manual and Procedures of SAIL Vigilance including 20 well defined procedures, for registration and processing of complaints, investigation, risk and opportunity, processing of vigilance cases, system improvement, surprise checks & file scrutiny, intensive technical examination of high value cases/projects, vigilance clearance, training, scrutiny of property returns etc.
- iv. Vigilance Manual of SAIL Vigilance which specifies and covers the following :
 - Complaint Handling Mechanism
 - Lodging of On Line Complaints
 - Investigation
 - Procedure for taking decision on Inquiry Reports
 - Surprise Check & Inspection of sensitive areas.
 - File Scrutiny of corruption prone areas.
 - Procedure for conducting Regular Departmental Action
 - Preparation of following Lists to keep a watch by Vigilance / CBI:
 - Agreed List of Suspected Officers and Agreed List of Points and Places of corruption in consultation with CBI
 - List of Officers of Doubtful Integrity
 - Lists of Unscrupulous Suppliers, Contractors, Clearing Agents etc.
 - List of Sensitive Areas/ Departments and Job rotation
 - Annual Immovable Property Returns
 - Training and Awareness
 - System Improvement Projects
 - Intensive Examination of High Value Projects
- v. Vigilance clearance – To check the integrity of employees being considered for promotion. Completion of probation period, conferment of award, settlement of dues on superannuation, etc.
- vi. Processing of complaints received under Public Interest Disclosure and Protection of Informers Resolution (Whistle Blower Mechanism) – Which assures the complainant about his / her identity being kept secret.
- vii. Vigil Mechanism, which encourages and protects SAIL employees to lodge complaints about irregularity / bribery etc.

- viii. Integrity Pact – To establish a mechanism for Independent External Monitoring of high value procurements / contracts in line with the stipulations of Transparency International. The Integrity Pact is an agreement between the Principal and bidder, binding both parties to ethical conduct. It contains rights and obligations to the effect that both sides will be transparent in their dealings, that neither side will pay, offer, demand or accept bribes, that bidder will not collude with competitors to obtain the contract etc.
- ix. Purchase / Contract Procedure 2020 – To establish guidelines for processing of tenders for procurement of material and services across all Plants / Units of SAIL.
- x. E-Enabled Processes of Tendering/Finance (SAP/SRM, Reverse Auction, Forward Auction, SAIL Tender website etc.)
- xi. SAIL Policy for Import of Coal and Coke
- xii. Standard Bidding Documents for Turnkey Projects - To establish guidelines for processing of Turnkey Projects (tendering and execution) across all Plants / Units of SAIL.
- xiii. Procedure for Banning of Business Dealings with Suppliers – For preventing bribery and , forgery; and to maintain integrity of business transactions with the suppliers, vendors and contractors.
- xiv. Gift Policy – As part of SAIL CDA Rules
- xv. SAIL General Tender terms (SAIL P1)

8.2 Due diligence

SAIL has assessed the nature and extent of the bribery risk in relation to specific transactions, projects, activities, business associates and personnel falling within those categories. The assessment includes any due diligence necessary to obtain sufficient information to assess the bribery risk. The due diligence shall be updated from time to time, so that changes and new information can be properly taken into account

Cross Reference:

- Due diligence on recruitment.
- Due diligence on Vendor Registration
- List of Sensitive Areas/ Departments and Job rotation
- Preparation of following Lists to keep a watch by Vigilance / CBI:
 - Agreed List of Suspected Officers and Agreed List of Points and Places of corruption in consultation with CBI
 - List of Officers of Doubtful Integrity
 - Lists of Unscrupulous Suppliers, Contractors, Clearing Agents etc.
- Surprise Check & Inspection of sensitive areas.
- File Scrutiny of corruption prone areas.
- Annual Immovable Property Returns
- Procedure for Processing Vigilance Clearance

8.3 Financial Controls

SAIL has implemented financial controls that manage bribery risk.

Cross Reference:

- Budget
- Delegation of power
- E-Enabled Processes of Tendering/Finance (SAP/SRM, Reverse Auction, Forward Auction, SAIL Tender website etc.)
- Payment System
- Purchase / Contract Procedure 2020

- Standard Bidding Documents for Turnkey Projects - To establish guidelines for processing of Turnkey Projects (tendering and execution) across all Plants / Units of SAIL.
- SAIL Policy for Import of Coal and Coke

8.4 Non – financial controls

SAIL has established a system to implement non- financial controls that manage bribery risk with respect to areas such as procurement, operational, sales, commercial, human resources, legal and regulatory activities.

Cross Reference:

- i. SAIL CDA Rules 1977 amended from time to time.
- ii. Standing Orders for Non Executive Employees of Bokaro Steel Plant
- iii. Vigilance Manual of the Central Vigilance Commission (CVC)
- iv. QMS Manual and Procedures of SAIL Vigilance
- v. Vigilance Manual of SAIL Vigilance
- vi. Processing of complaints received under Public Interest Disclosure and Protection of Informers Resolution (Whistle Blower Mechanism)
- vii. Vigil Mechanism
- viii. Integrity Pact
- ix. Purchase / Contract Procedure 2020
- x. SAIL Policy for Import of Coal and Coke
- xi. Standard Bidding Documents for Turnkey Projects
- xii. Procedure for Banning of Business Dealings with Suppliers
- xiii. Gift Policy – As part of SAIL CDA Rules
- xiv. SAIL General Tender terms (SAIL P1)

8.5 Implementation of anti-bribery controls by controlled organizations and by the Business Associates

8.5.1 SAIL has established a system to upload the ABMS policy on SAIL Website, SAIL Tender Website and Intranet Portals of SAIL Plants / Units to intimate about ABMS Policy and ABMS. SAIL will create awareness of ABMS and implementation of ABMS in the respective SAIL Plant / Unit to its business associates with a view to encourage them to either implement anti-bribery management system in their organisation or to implement their own anti-bribery controls.

Cross Reference:

- ABMS Policy (Vision Statement)
- External Communication with Suppliers/ Business Associates
- Integrity Pact

8.6 Anti-bribery commitments

For business associates which pose more than a low bribery risk, SAIL has implemented procedures which require that, as far as practicable:

- a) business associates commit 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) SAIL is able 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 transaction, project, activity, or relationship.

Where it is not practicable to meet the requirements of a) or b) above, this shall be a factor taken into account in evaluating the bribery risk of the relationship with this Interested Party and the way in which the organization manages such risks.

Cross Reference:

- SAIL General Tender terms (SAIL P1) /Anti Bribery Undertaking from Supplier/ Vendor
- Integrity Pact
- Procedure for Banning of Business Dealings with Suppliers

8.7 Gifts, hospitality, donations and similar benefits

SAIL has implemented procedures that are designed to prevent the offering, provision or acceptance of gifts, hospitality, donations and similar benefits which is or could reasonably be perceived as, bribery. Rule 12.0 under SAIL Conduct, Discipline and Appeal (SAIL CDA) Rules, 1977 stipulates provisions regarding acceptance of "Gift(s)" by the employees covered under SAIL CDA Rules. Acceptance of gifts except as provided in SAIL CDA Rules 1977 is not permissible.

Cross Reference:

- SAIL Conduct, Discipline and Appeal (SAIL CDA) Rules, 1977
- Gift Policy – As part of SAIL CDA Rules
- Format for declaration of gift (**Annexure No. 4 - F/ABMS/GF 01/Ver 2.0 Dated 11.07.2023**)

8.8 Managing inadequacy of anti-bribery controls

SAIL has established systems to act on the inadequacy found during due diligence to take appropriate steps to enable the organization to manage the relevant bribery risks, which includes the following:

- a) in the case of an existing transaction, project, activity or relationship, take steps appropriate to the bribery risks and the nature of the transaction, project, activity or relationship to terminate, discontinue, suspend or withdraw from it as soon as practicable;
- b) in the case of a proposed new transaction, project, activity or relationship, postpone or decline to continue with it.

Cross Reference:

- SAIL Conduct, Discipline and Appeal (SAIL CDA) Rules, 1977
- Procedure for conducting Regular Departmental Action
- SAIL General Tender terms (SAIL P1)
- Integrity Pact
- Purchase / Contract Procedure 2020
- Standard Bidding Documents for Turnkey Projects
- Procedure for Banning of Business Dealings with Suppliers

8.9 Raising concerns

SAIL has established systems and procedures which:

a) encourage and enable persons to report in good faith or on the basis of a reasonable belief attempted, suspected and actual bribery, or any violation of or weakness in the anti- bribery management system, to the anti-bribery compliance function or to appropriate personnel (either directly or through an appropriate third party);

b require that the organization treats reports confidentially as mandated by CVC Guidelines, so as to protect the identity of the reporter and of others involved or referenced in the report;

c) prohibit retaliation and protect those making reports from retaliation, after they have in good faith, or on the basis of a reasonable belief, raised or reported a concern about attempted, actual or suspected bribery or violation of the anti-bribery policy or the anti-bribery system; as per Public Interest Disclosure and Protection of Informer Policy by Central Vigilance Commission

d) enable personnel to receive advice from an appropriate person on what to do if faced with a concern or situation which could involve bribery.

SAIL has ensured that all personnel are aware of the reporting procedures and are able to use them, and are aware of their rights and protections under the procedures.

Cross Reference:

- Public Interest Disclosure and Protection of Informers Resolution (Whistle Blower Mechanism)
- Vigil Mechanism
- Integrity Pact
- Lodging of On Line Complaints
- Grievance redressal

8.10 Investigating and dealing with bribery

Complaints received shall be investigated by SAIL Vigilance Deptts. SAIL Vigilance has well documented systems and procedures that (a) require assessment and, where appropriate, investigation of any bribery or violation of the anti-bribery policy or the anti-bribery policy management system, which is reported, detected or reasonably suspected; b) require appropriate action in the event that the investigation reveals any bribery or violation of the anti- bribery policy or the anti-bribery policy management; c) empower and enable investigators and require cooperation by relevant personnel d) require that the status and the results of the investigation are reported to the anti-bribery compliance function and other compliance functions, as appropriate. The investigation is carried out by, and reported to, personnel who are not part of the role or function being investigated.

Cross Reference:

- a) Vigilance Manual of the Central Vigilance Commission (CVC)
- b) QMS Manual and Procedures of SAIL Vigilance
- c) Vigilance Manual of SAIL Vigilance which inter-alia specifies and covers the following measures:
 - Complaint Handling
 - Lodging of On Line Complaints
 - Investigation
 - Procedure for taking decision on Inquiry Reports
 - Procedure for initiating Regular Departmental Action
- d) SAIL CDA Rules 1977 amended from time to time.
- e) Standing Orders for Non Executive Employees

Performance Evaluation

Section Number : ABMS 12

Version Number :3.0

Date : 11.07.2023

9 Performance Evaluation;

9.1 Monitoring measurement, analysis and evaluation

The ABMS Compliance Teams shall assess on a continual basis whether the anti-bribery management system is, (a) adequate to manage effectively the bribery risks faced by the organization and (b) being effectively implemented. Once a year, the Compliance Teams shall report on the adequacy and implementation of the ABMS and audits conducted for ABMS; to their Top Management for ABMS. Compliance Teams also shall suggest changes, if any, required in the Systems and Procedures for ABMS. The ABMS Review Reports of the Top Management for ABMS of each Plant /Unit shall be forwarded to CVO, SAIL for submitting a consolidated Report to the SAIL Board for governing body review of ABMS. Compliance Team/HODs/MR may suggest changes, if any, required in the Systems and Procedures for ABMS, for consideration of CVO, SAIL/ Competent Authority.

Cross Reference:

- Minutes of Review Meeting with Compliance Team / Governing Body /Top Management.

9.2 Internal Audit: SAIL has formulated the following Procedure to conduct Internal audit:

Objective of the Activity	System to control activities
Frequency of ABMS Internal Audit	Once in a year
Internal Audit Plan	Internal audit Plan will be made for the whole year. Considering the frequency of the Internal Audit. The ABMS – Audit plan will be developed based on: <ul style="list-style-type: none"> ➤ Status of previous audits ➤ Significant areas ➤ The criteria for ABMS audit program includes the results of risk assessments of the organization’s activities, and the results of previous audits ➤ Frequent customer complaints ➤ Internal non-conformances ➤ External audit findings
Internal Audit Schedule	For each internal audit, specific Internal Audit Schedule will be prepared (covering date and time of the audit, Auditor’s and Auditee’s names and departments) to ensure un-biased audit approach, internal audit is conducted cross-functionally
How the Internal Audit is conducted	Internal Audit is conducted by the trained and competent Internal Auditors, as per the Internal Audit Schedule, with the help of Audit Checklist. It will be ensured that no auditor is auditing his or her own area of work.
Audit Checklist	The Internal Auditor will prepare the Internal audit Checklist, based on the audit scope and the audit criteria so that internal audit can be conducted effectively.
Audit Observation	(a)During the internal audit if any Non-Conformance (NC) is identified, the details of such NC will be raised through Internal Audit NC Report. (b) During the internal audit if any potential NC / Opportunity for Improvement (OFI) is identified, the same will be reported for taking necessary Corrective and / or Risk Management Actions.
Actions against the Audit Observation	Necessary actions (correction, root cause analysis and corrective action) will be taken by the Auditee. Wherever possible, post corrective action, Risk Management Actions will also be taken and recorded.

Review of Actions	<p>(a) The details of NC and / or OFI will be reviewed during the Management Review Meeting.</p> <p>(b) During the next internal audit, effectiveness of the actions taken against the NC/OFI raised during the last audit will be reviewed.</p>
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Cross Reference:

- Internal Audit Plan
- Internal Audit Schedule
- Internal Audit Report
- Minutes of the Compliance Team Review Meeting
- Minutes of the Management Review Meeting

9.3 Management review

9.3.1 Governing Body and Top Management Review

The Top Management for ABMS of each Plant /Unit shall hold annual review meeting to assess implementation of and effectiveness of ABMS. The review reports of the Top Management for ABMS of the SAIL Plants and Units shall be forwarded to CVO, SAIL. CVO, SAIL shall present a consolidated Top Management review reports for ABMS to the SAIL Board for governing body review of ABMS; to ensure continuing suitability, adequacy and effectiveness of ABMS. The review shall include consideration of:

- a) the status of actions from previous management reviews;
- b) changes in external and internal issues that are relevant to the anti-bribery management system;
- c) information on the performance of the anti-bribery management system, including trends in:
 - i. nonconformities and corrective actions;
 - ii. monitoring and measurement results;
 - iii. audit results;
 - iv. reports of bribery;
 - v. investigations;
 - vi. the nature and extent of the bribery risks faced by the organization;
- d) effectiveness of actions taken to address bribery risks;
- e) opportunities for continual improvement of the anti-bribery management system.

The outputs of the top management review shall include decisions related to continual improvement opportunities and any need for changes to the anti-bribery management system.

9.4 Review by anti-bribery compliance function

The ABMS Compliance Teams shall assess on a continual basis whether the anti-bribery management system is, (a) adequate to manage effectively the bribery risks faced by the organization and (b) being effectively implemented. Once a year, the Compliance Teams shall report on the adequacy and implementation of the ABMS and audits conducted for ABMS; to their Top Management for ABMS. Compliance Teams also shall suggest changes, if any, required in the Systems and Procedures for ABMS. The ABMS Review Reports of the Top Management for ABMS of each Plant /Unit shall be forwarded to CVO, SAIL for submitting a consolidated Report to the SAIL Board for governing body review of ABMS.

Cross Reference:

- Minutes of the Compliance Team Review Meeting
- Minutes of the Management Review Meeting

10.0 Improvement

Section Number : ABMS 13

Version Number :3.0

Date : 11.07.2023

10 Improvement:

10.1 Nonconformity and corrective action:

Activity	System to control activities
Sources of ABMS related NC	<p>A Non-Conformance (NC), which is considered as non-fulfilment of any requirement, can be identified through following sources</p> <ol style="list-style-type: none"> a. Internal or external audits. b. Customer or interested parties complaints. c. Inspections. d. Employees' suggestions/ Participation e. Accidents or emergencies. f. Consultation with employees g. Legal notices. h. Evaluation of compliance to legal & other requirements <p>Once the Non-Conformance (NC) is reported, the same will be recorded in the NC & CA Form.</p>
How Correction is taken	<p>If the NC is found justified, immediate action will be taken to resolve the problem and NC & CA Form will be updated.</p> <p>In case of Non-conforming Products - To take up with suppliers and ask for replacement or compensation etc. as per the Contract/ Agreement</p> <p>In case of Non-conforming Services – To ask service providers to redo or rectify the nonconformities as per the Contract / Agreement.</p>
How Root Cause is analyzed	<p>Further to the immediate action to resolve the NC, thorough root cause identification will be done. NC & CA Form will be updated.</p>
How Corrective Action is taken	<p>Based on the root cause identification, corrective action will be taken to eliminate the cause of the Non Conformance. NC & CA Form will be updated.</p>
How review of effectiveness of the actions (Correction, Root Cause analysis and Corrective action & Preventive action) is done	<p>The effectiveness of the actions (Correction, Root Cause analysis, Corrective & Risk Management Action) will be reviewed within the defined timeframe to understand to what extent the identified NC has been mitigated and/or eliminated. The impact of the (a) Correction (b) Root Cause Analysis and (c) Corrective Action (d) Effectiveness of the Corrective Action (e) Risk Management Action will be reviewed during the Management Review meeting and Risk Assessment (which will be conducted on yearly interval).</p>
Communication	<p>The status of actions (Correction, Root Cause analysis, Corrective and Risk Management action) will be communicated to the interested party.</p>

10.2 Continual improvement

SAIL shall continually improve the suitability, inadequacy and effectiveness of the anti-bribery management system.

Annexures to ABMS Manual

ADDRESSES OF CMO OFFICES

	LOCATION	NAME OF OFFICE	ADDRESS
1	KOLKATA	HQ	ISPAT BHAVAN, 40 J L NEHRU ROAD, KOLKATA - 700 071
2		T & S	6TH FLOOR , SAIL HOUSE, 50 CHOWRINGHEE ROAD, KOLKATA 71
3		RO	ISPAT BHAVAN, 3RD FLOOR, 40 J L NEHRU ROAD, KOLKATA - 700 071
4		BSO	IISCO HOUSE (5TH FLOOR), 50, J L NEHRU ROAD, KOLKATA - 700071
5		WH	WAREHOUSE DANKUNI, CHIKHRAND, JANAI ROAD, DISTT- HOOGHLY -712304
6		BTSO	6TH FLOOR SAIL HOUSE, 50 CHOWRINGHEE ROAD, KOLKATA 71
7	DURGAPUR	DURGAPUR BSO	SURYA SEN SARANI, DURGAPUR 713 208 (WB)
8		DURGAPUR WH	SURYA SEN SARANI, DURGAPUR 713 208 (WB)
9		SRM/DSP	SRM OFFICE-DSP, SURYA SEN SARANI, DURGAPUR 713 208 (WB)
10	BURNPUR	SRM/ISP	SRM OFFICE-ISP, EVELYN LODGE - OLD DPC BUILDING, BESIDE LIC OFFICE, GT ROAD , ASANSOL : 713304
11	ROURKELA	ROURKELA BSO	BSO - F10, SECTOR - II, ROURKELA - 769006
12		ROURKELA WH	OLD TIMBER WORKSHOP, ROURKELA - 769010
13		SRM/RSP	SRM OFFICE-RSP, F10, 1ST FLOOR, SECTOR - 2, ROURKELA - 769006, FAX - 2600034,
14	BOKARO	BOKARO BSO	CMO COMPLEX, MG ROAD, NEAR ADMN. BLDG., BOKARO STEEL CITY - 827001
15		BOKARO WH	MARAFARI, BOKARO STEEL CITY - 827001
16		SRM/BSL	SRM OFFICE - BSL , CMO COMPLEX, MG ROAD, BOKARO STEEL CITY - 827001
17	GUWAHATI	GUWAHATI BSO	PALTAN BAZAR, NEAR NANDAN HOTEL, HPB ROAD, GUWAHATI - 781008
18	BHUBANESWAR	BHUBANESWAR BSO	271, BIDYUT MARG, UNIT-4, SHASTRI NAGAR, BHUBANESWAR 751001
19	PATNA	PATNA BSO	LAV KUSH TOWER (5TH FLOOR), EXHIBITION ROAD, PATNA-800001
20	HALDIA	BTSO HALDIA	SUPER MARKET BUILDING, DURGACHAK, HALDIA-721602
21	DELHI	DELHI ITD	17TH FLOOR, SCOPE MINAR, LAXMI NAGAR DISTT.CENTRE, DELHI -92
22		RO	17TH FLOOR, SCOPE MINAR, LAXMI NAGAR DISTT.CENTRE, DELHI -92
23		DELHI BSO	18TH FLOOR, SCOPE MINAR, LAXMI NAGAR DISTT.CENTRE, DELHI -92
24		DELHI WH	TUGHLAKABAD WAREHOUSE, PLOT NO: B4-B8, OKHLA IND. AREA, B-BLOCK, PHASE-1, NEW DELHI

25	GHAZIABAD	GHAZIABAD BSO	GDA COMMERCIAL COMPLEX, 1ST FLOOR, NAVYUG MARKET, GHAZIABAD-201001
26		GHAZIABAD WH	NEAR GULDHAR RAILWAY STATION, GHAZIABAD
27	CHANDIGARH	CHANDIGARH BSO	SCO-27, SECTOR-26, MADHYA MARG, CHANDIGARH-160019
28	JALANDHAR	JALANDHAR BSO	OPPOSITE UCI, G.T.ROAD, SURANUSSI, JALANDHAR -144 027,
29	FARIDABAD	FARIDABAD BSO	FUN CITY MALL, 1ST FLOOR, PLOT NO: 2, SECTOR-20-A, AJRONDA CHOWK, MATHURA ROAD, FARIDABAD-121 001
30		FARIDABAD WH	BALLABHGARH WAREHOUSE, SECTOR-5, NEAR GOODYEAR CHOWK, (OPPOSITE SANT SUR DAS-SIHI METRO STATION), BALLABHGARH
31	KANPUR	KANPUR BSO	1ST FLOOR, NEAR BHAUTI CHUNGI, P.O. GANGAGANJ, PANKI, KANPUR - 208 001
32		KANPUR WH	NEAR BHAUTI CHUNGI, P.O. GANGAGANJ, PANKI, KANPUR
33	PRAYAGRAJ	PRAYAGRAJ BSO	22-A, MUIR ROAD, PRAYAGRAJ -211 002
34		PRAYAGRAJ WH	NAINI, NEAR M/S TSL, MIRZAPUR ROAD, PRAYAGRAJ
35	MANDIGOBINDGARH	MANDIGOBINDGARH BSO	GROUND FLOOR, HOTEL TIME SQUARE, G.T.ROAD,MANDI GOBINDGARH-147301
36	LUDHIANA	LUDHIANA BSO	2ND FLOOR, DHYAN SINGH COMPLEX, NEAR BUS STAND
37	JAMMU	JAMMU BSO	OB-24, RAIL HEAD COMMERCIAL COMPLEX, NEAR PANAMA CHOWK, JAMMU -180 006
38		JAMMU WH	BEHIND JAMMU TAWI RAILWAY STATION, JAMMU
39	CHENNAI	CHENNAI RO	SOUTHERN REGION, ISPAT BHAVAN, NO.5, KODAMBAKKAM HIGH ROAD, CHENNAI 600 034
40		CHENNAI BSO	BRANCH SALES OFFICE, ISPAT BHAVAN, FIRST FLOOR, NO.5, KODAMBAKKAM HIGH ROAD, NUNGAMBAKKAM, CHENNAI 600 034
41		CHENNAI WH	MMDA IRON & STEEL MARKET, SATHANKADU, MANALI, CHENNAI 600 068
42	BANGALORE	BANGALORE BSO	BRANCH SALES OFFICE. VISL HOUSE (3RD & 4TH FLOORS), NO.8 J C ROAD, BANGALORE 560 002
43		BANGALORE WH	RAMAMURTHY NAGAR, CHANNASANDRA, BANGALORE 560 016
44	HYDERABAD	HYDERABAD BSO	BRANCH SALES OFFICE, TARAMANDAL(9TH FLOOR), 5-9-13 SAIFABAD, HYDERABAD 500 004
45		HYDERABAD WH	NAGULAPALLI VILLAGE, DIST :MEDAK 502 300
46	COIMBATORE	COIMBATORE BSO	BRANCH SALES OFFICE, CHERAN TOWERS (2ND FLOOR), NO.81 GOVT ARTS COLLEGE ROAD, COIMBATORE 641 018

47		COCHIN BSO	BRANCH SALES OFFICE, GCDA COMML. COMPLEX (3RD FLOOR), SHANMUGAM ROAD, MARINE DRIVE, KOCHI - 682 031
48	VIJAYWADA	VIJAYWADA BSO	BRANCH SALES OFFICE, FF2, GVR TOWERS , (1ST FLOOR), BHARATI NAGAR, RING ROAD, VIJAYAWADA 520 008
49		VIJAYWADA WH	OPP. UNION PETROL BUNK, BESIDE BLUE DART GODOWN, DONE ATKUR,NIDAMANURU, VIJAYWADA-521104
50	VIZAG	VISHAKHAPATNAM BSO	BRANCH SALES OFFICE, PLOT NO.39, OPP. R K BEACH, VISAKHAPATNAM 530 003
51		VISHAKHAPATNAM WH	APIIC INDUSTRIAL ESTATE, D BLOCK (EXPANSION), AUTONAGAR, VISAKHAPATNAM 530 012
52		VISHAKHAPATNAM BTSO	3RD FLOOR, PLOT-39, OPP RK BEACH BUS STAND, VISAKHAPATNAM - 530003
53		VISHAKHAPATNAM EXPORT YARD	HARBOUR APPROACH ROAD, NEAR PORT NORTH GATE, VISAKHAPATNAM-530035
54	TRICHY	TRICHY BSO	BRANCH SALES OFFICE, ESPEE COMPLEX, 52 HEBER ROAD, CANTONMENT, TIRUCHIRAPALLI 620 001
55		TRICHY WH	CWC COMPLEX, K K NAGAR, TIRUCHIRAPALLI 620 021
56	PARADIP	PARADIP BTSO	ISPAT BHAVAN, PARADIP, JAGATSINGHPUR DIST., ODISHA - 754142
57	MUMBAI	MUMBAI RO	THE METROPOLITAN, 8TH FLOOR, BANDRA KURLA COMPLEX, BANDRA EAST, MUMBAI - 400051
58		MUMBAI BSO	THE METROPOLITAN, 9TH FLOOR, BANDRA KURLA COMPLEX, BANDRA EAST, MUMBAI - 400051
59		MUMBAI WH	KALAMBOLI, DISTRICT : RAIGAD, NAVI MUMBAI - 400601
60	PUNE	PUNE BSO	506, AMAR BUSINESS PARK, BANER, PUNE - 411045
61	JAIPUR	JAIPUR BSO	LANDMARK, 'C' SCHEME, 4TH FLOOR, S-16A, MAHAVIR MARG, OPPOSITE GUJARATI SAMAJ, JAIPUR 302001
62	BHILAI	BHILAI BSO	NEAR EQUIPMENT CHOWK, SECTOR 1, BHILAI 490 001
63		BHILAI WH	BEHIND BSP DISPOSAL YARD, BSP, Bhilai , Chhattisgarh
64		SRM/BSP	SRM OFFICE-BSP, NEAR EQUIPMENT CHOWK, SECTOR 1, BHILAI 490 001

65	JABALPUR	JABALPUR BSO	500, MARHATAL, JABALPUR 482 002
66	GWALIOR	GWALIOR BSO	RESHAM MILL ROAD, BIRLA NAGAR, GWALIOR 474 004
67	NAGPUR	NAGPUR BSO	SHREE MOHINI COMPLEX, 345 S V PATEL MARG, NAGPUR 440001
68	INDORE	INDORE BSO	502 & 503, FORTUNE AMBIANCE, SOUTH TUKOGANJ, INDORE - 452001 MADHYA PRADESH
69	AHMEDABAD	AHMEDABAD BSO	BANDHAN G H B COMPLEX, NEAR ANKUR BUS STAND, NARANPURA, AHMEDABAD 380 013
70	BARODA	BARODA BSO	8TH FLOOR, MARBLE ARCH, RACE COURSE CIRCLE, BARODA.390007
71	KOTA	KOTA BSO	ROAD NO 1, IPIA, NEAR DAKANIA TALAV RAILWAY STATION, KOTA 324005
72		KOTA WH	ROAD NO 1, IPIA, NEAR DAKANIA TALAV RAILWAY STATION, KOTA 324005

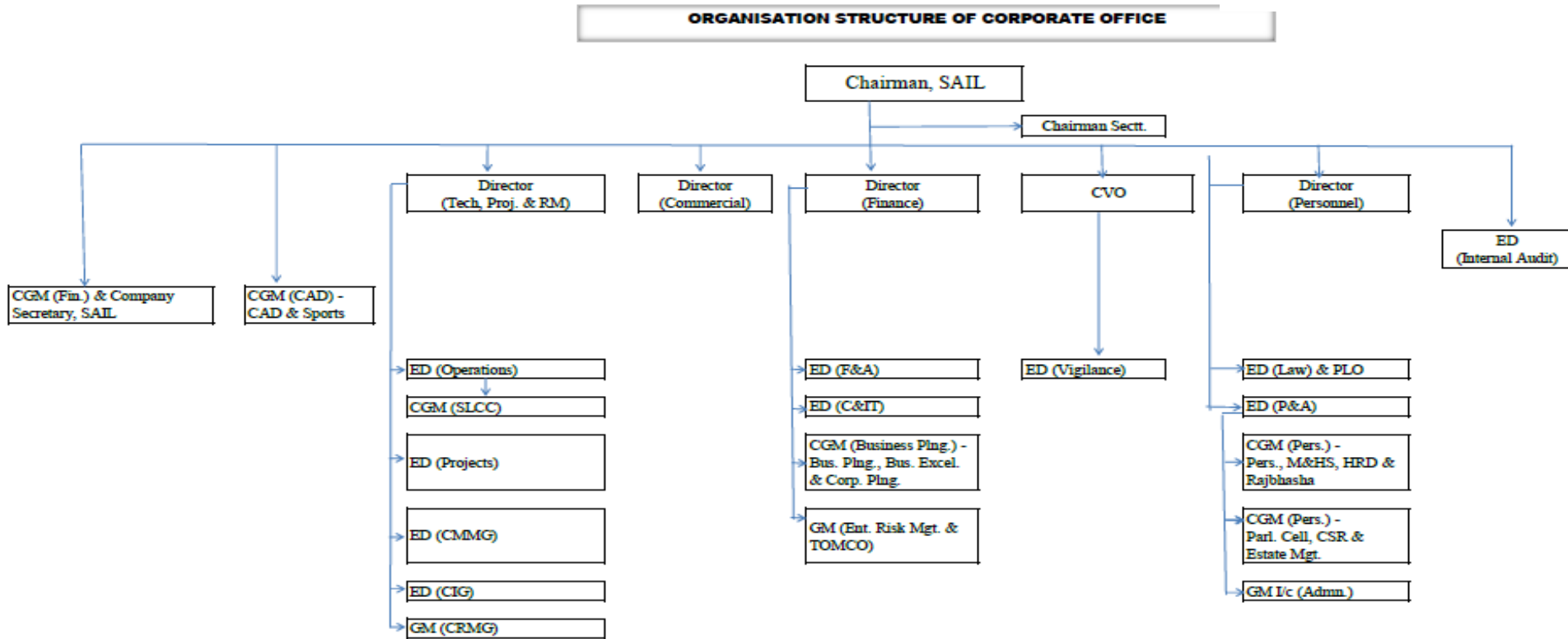
Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: Date:

Annexure-2

Organization Charts of Plants and Units

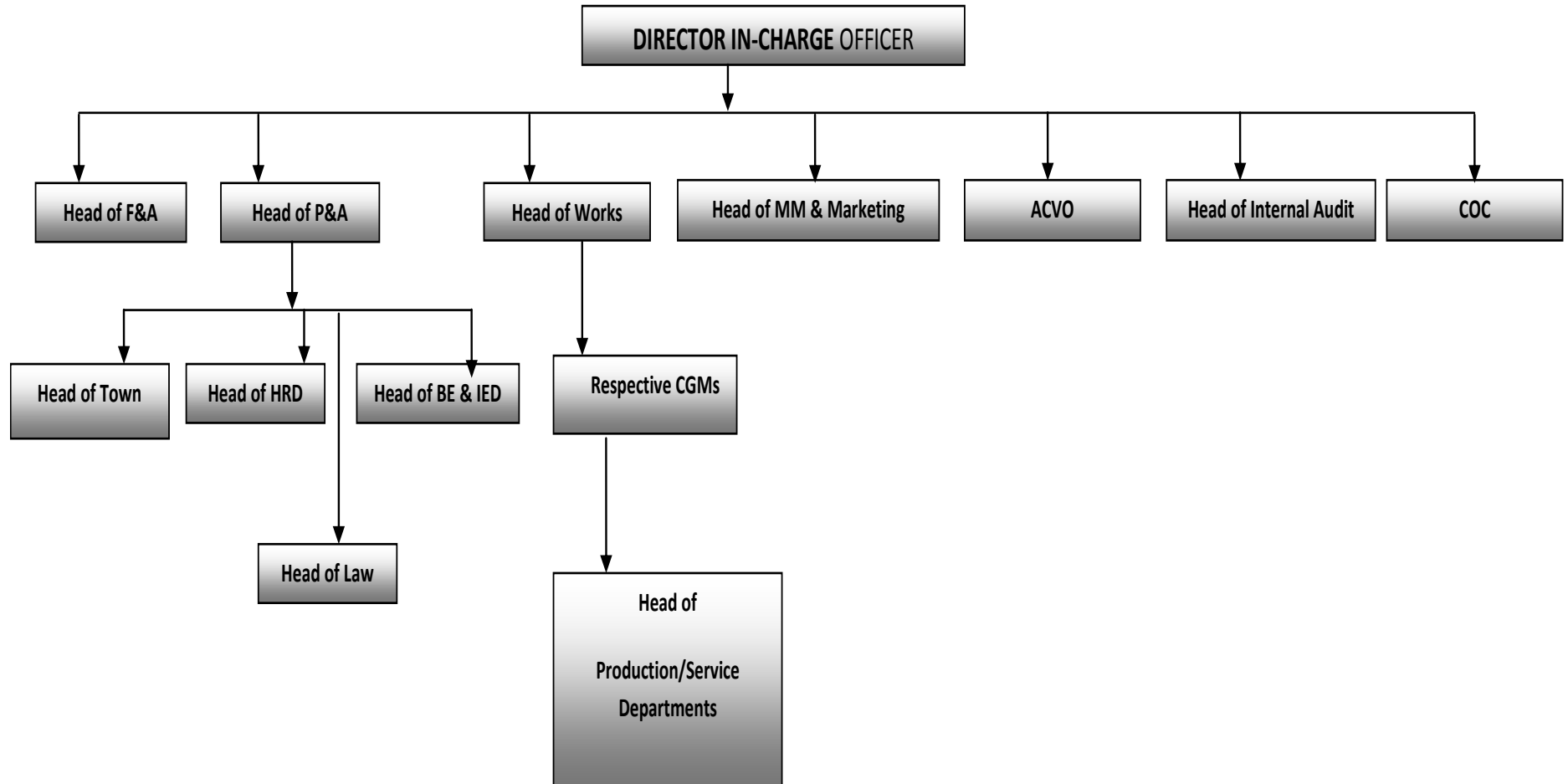
S.No.	Doc. No.	Title	Version #	Date	Page No.
1	D/ABMS/OC 01 CO/Ver 1.0	Organisation Chart of Corporate Office	01	01.09.2022	56
2	D/ABMS/OC 01 RSP/Ver 1.0	Organisation Chart of RSP	01	11.07.2023	57
3	D/ABMS/OC 01 DSP/Ver 1.0	Organisation Chart of DSP	01	11.07.2023	58
4	D/ABMS/OC 01 BSP/Ver 1.0	Organisation Chart of BSP	01	11.07.2023	59
5	D/ABMS/OC 01 BSL/Ver 2.0	Organisation Chart of BSL	02	01.09.2022	60
6	D/ABMS/OC 01 ISP/Ver 1.0	Organisation Chart of ISP	01	11.07.2023	61
7	D/ABMS/OC 01 ASP/Ver 1.0	Organisation Chart of ASP	01	11.07.2023	62
8	D/ABMS/OC 01 SSP/Ver 1.0	Organisation Chart of SSP	01	11.07.2023	63
9	D/ABMS/OC 01 CMO/Ver 1.0	Organisation Chart of CMO	01	11.07.2023	64
10	D/ABMS/OC 01 CFP/Ver 1.0	Organisation Chart of CFP	01	11.07.2023	65
11	D/ABMS/OC 01 SRU/Ver 1.0	Organisation Chart of SRU	01	11.07.2023	66
12	D/ABMS/OC 01 RDCIS/Ver 1.0	Organisation Chart of RDCIS	01	11.07.2023	67
13	D/ABMS/OC 01 CET/Ver 1.0	Organisation Chart of CET	01	11.07.2023	68
14	D/ABMS/OC 01 SSO/Ver 1.0	Organisation Chart of SSO	01	11.07.2023	69
15	D/ABMS/OC 01 MTI/Ver 1.0	Organisation Chart of MTI	01	11.07.2023	70
16	D/ABMS/OC 01 EMD/Ver 1.0	Organisation Chart of EMD	01	11.07.2023	71

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: Date:

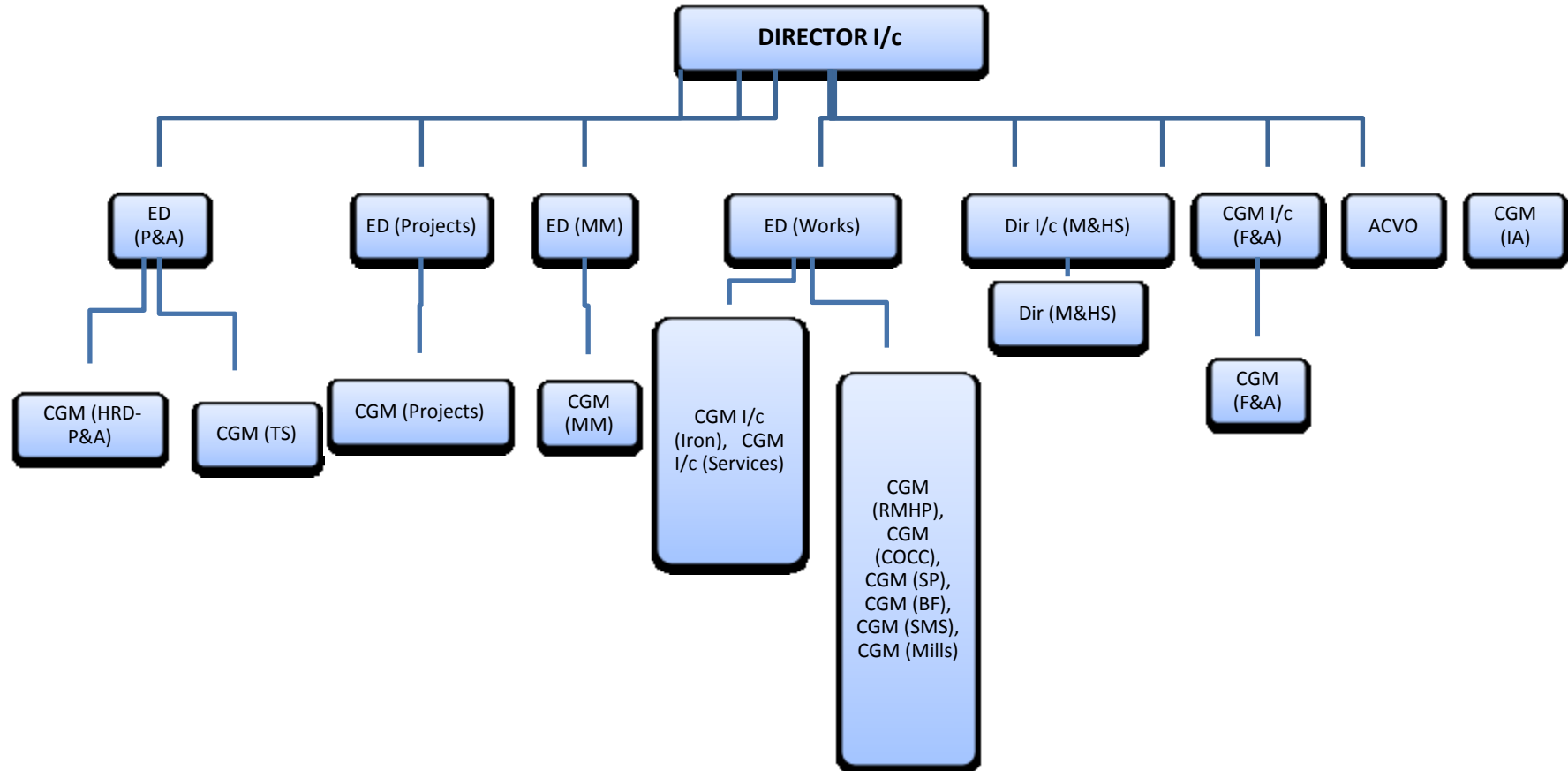


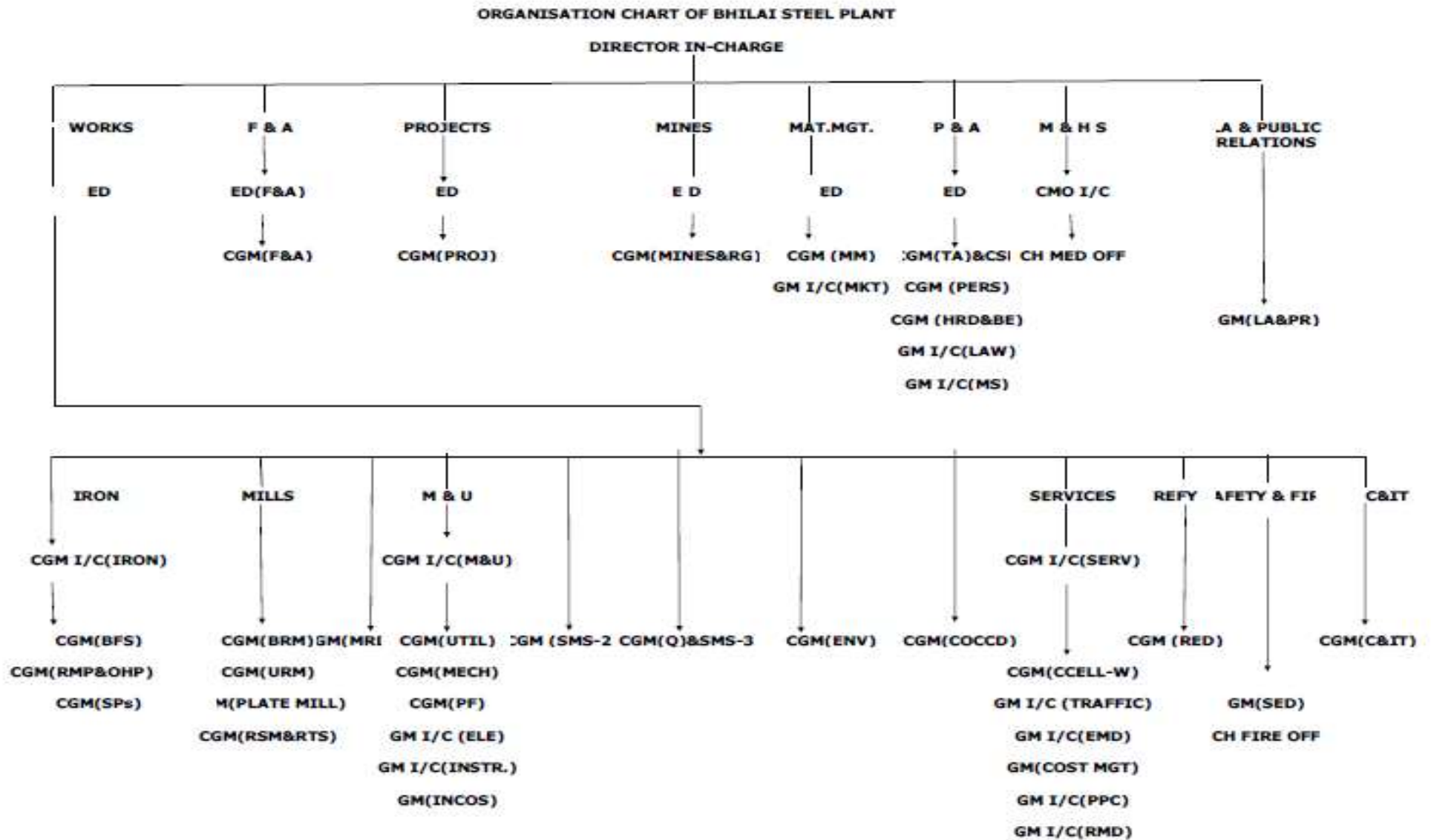
ROURKELA STEEL PLANT

ORGANISATION STRUCTURE

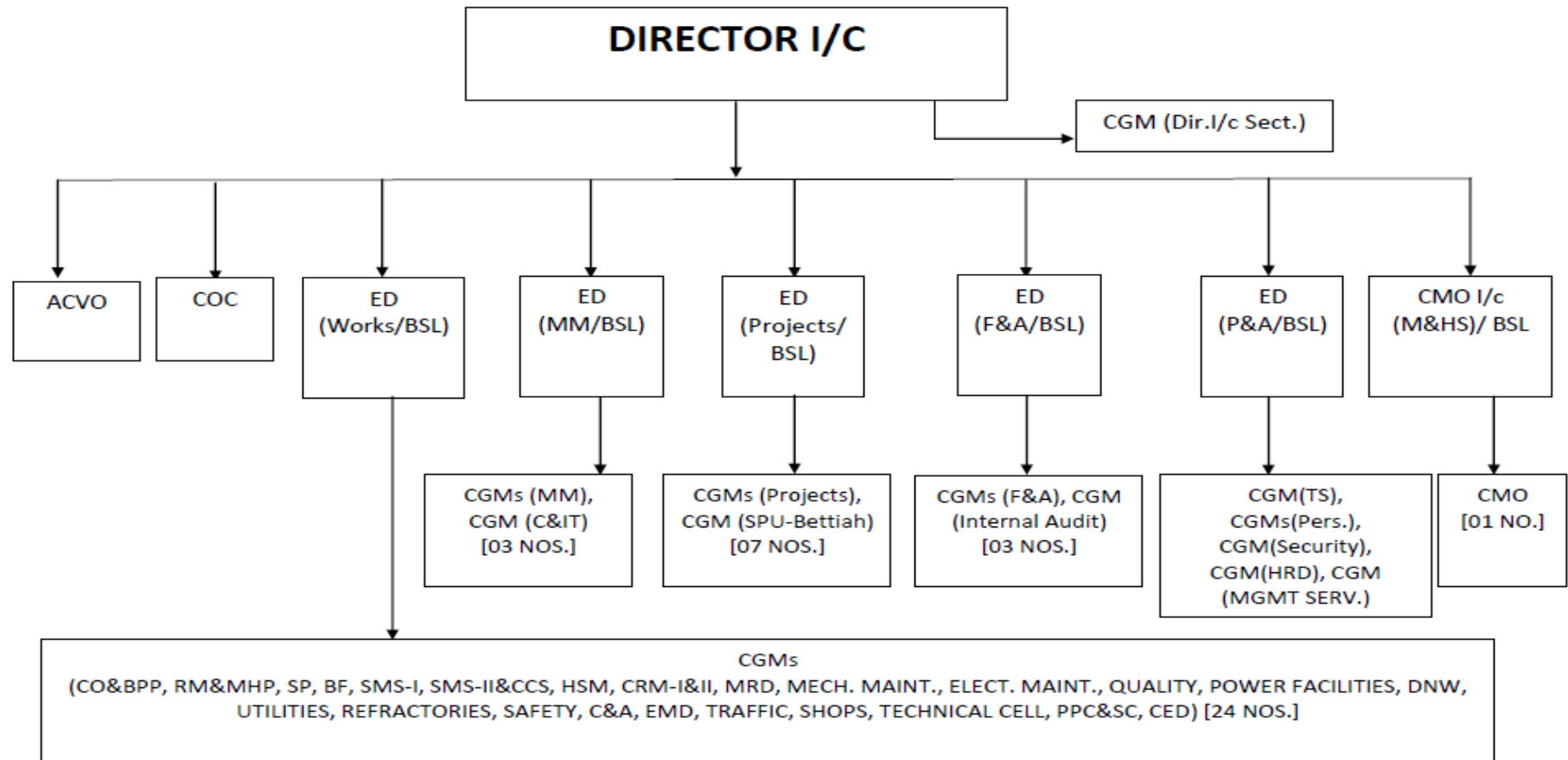


ORGANIZATION CHART DURGAPUR STEEL PLANT

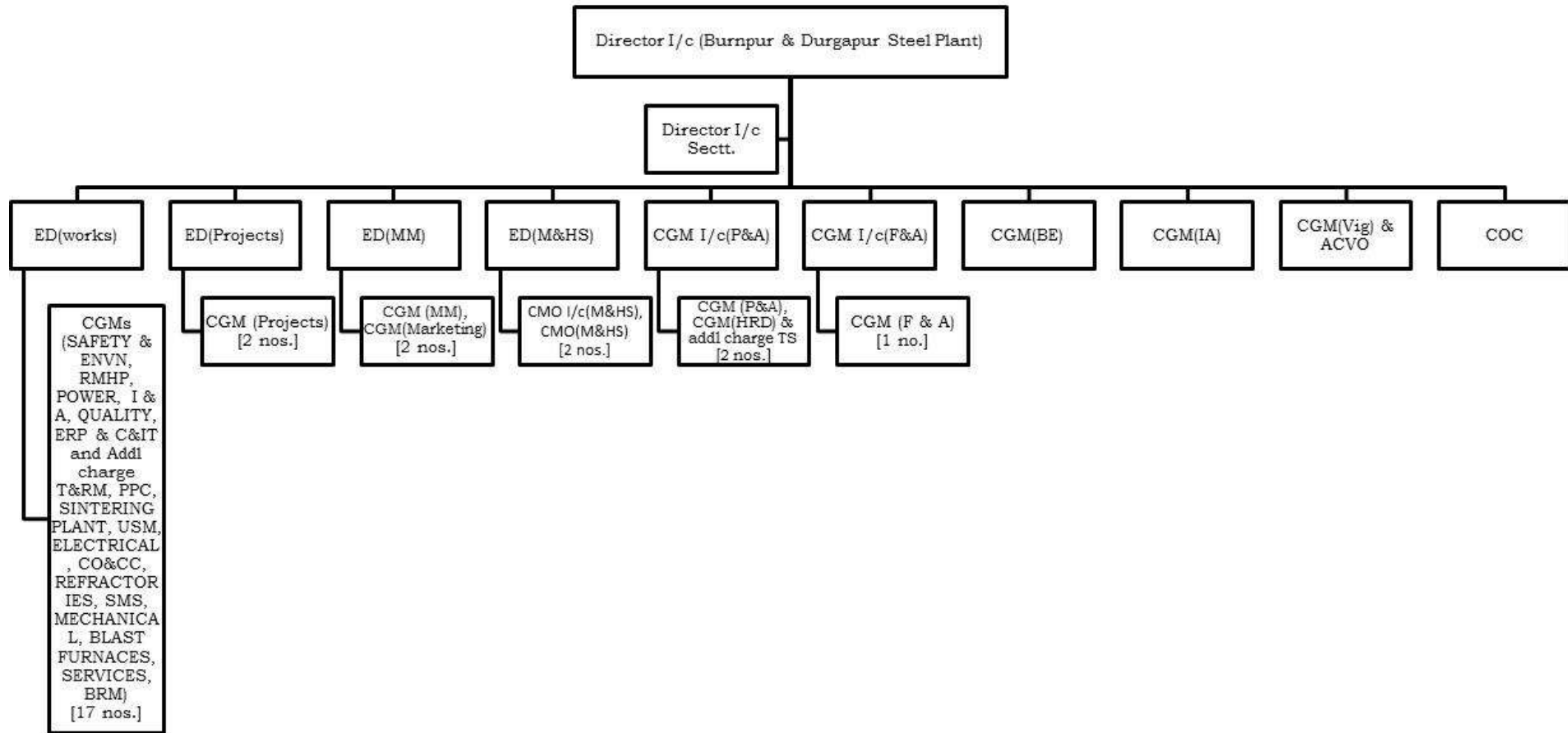




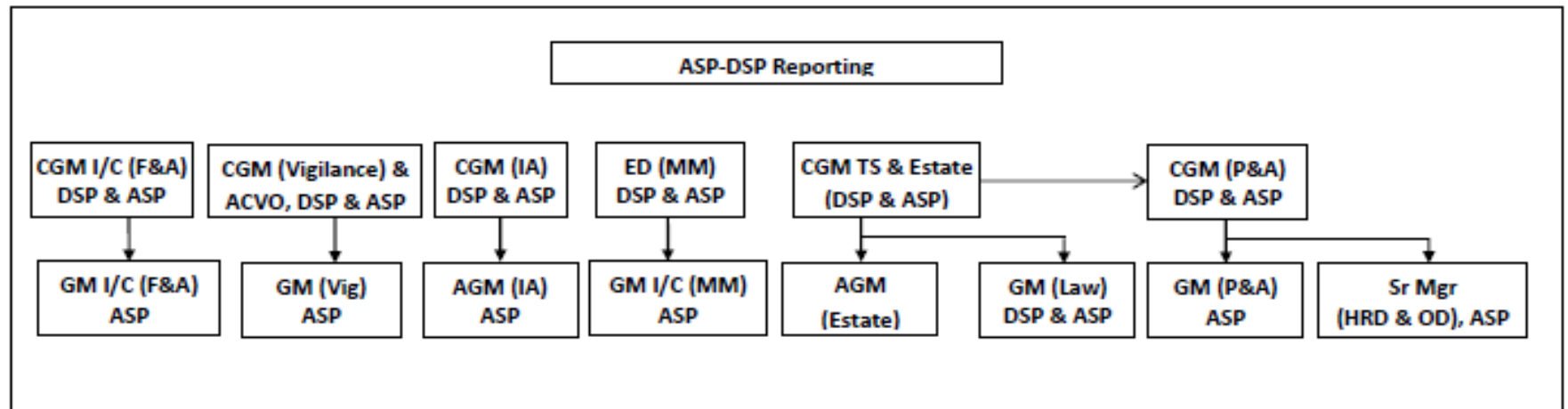
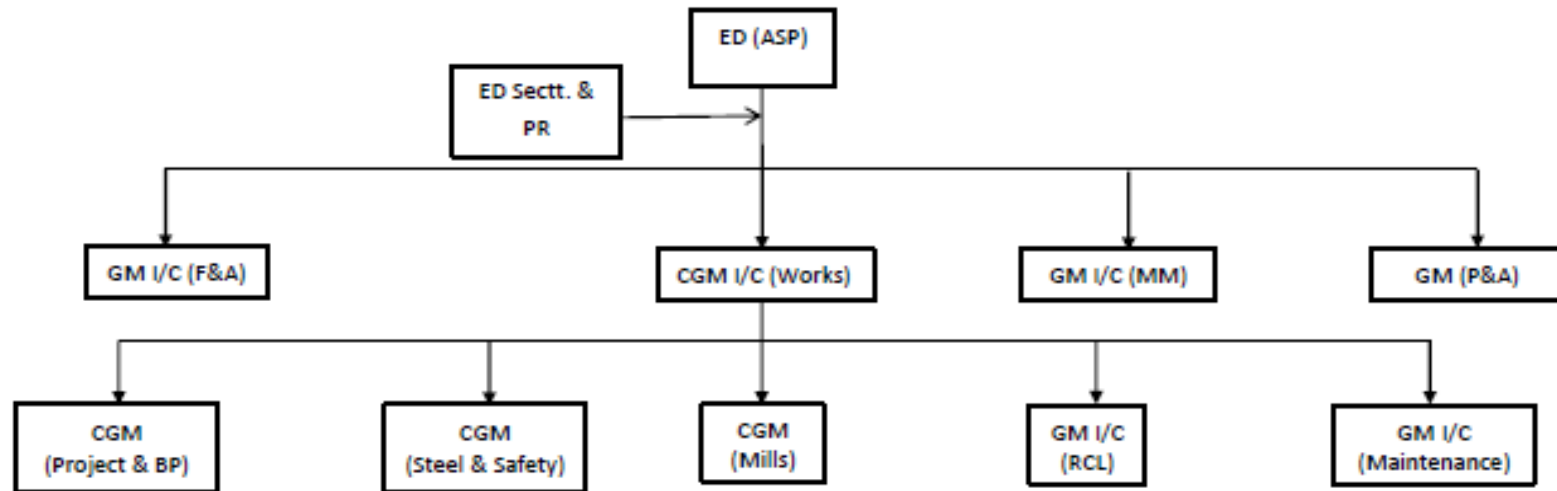
Organization Chart of Bokaro Steel Plant



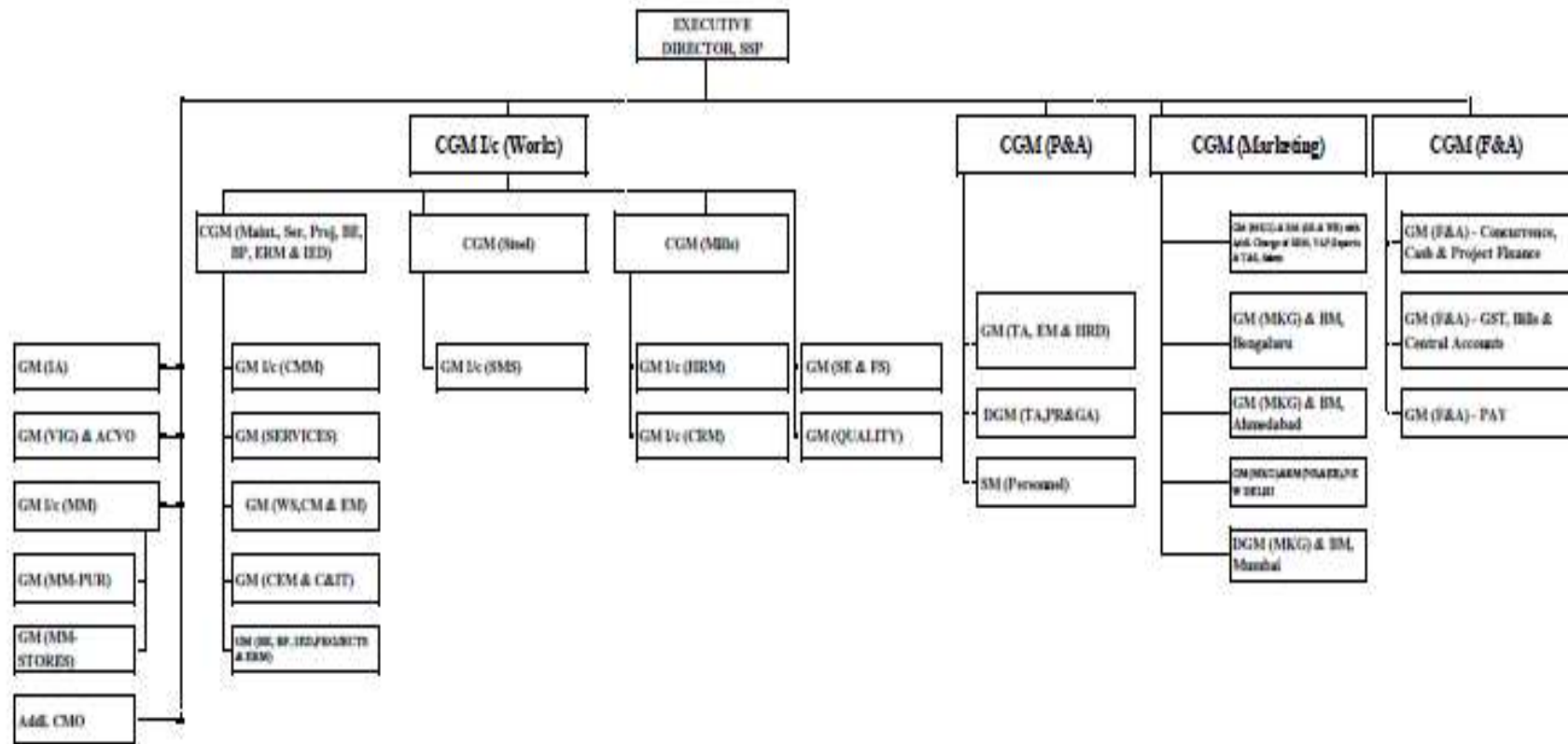
ORGANIZATION CHART IISCO STEEL PLANT



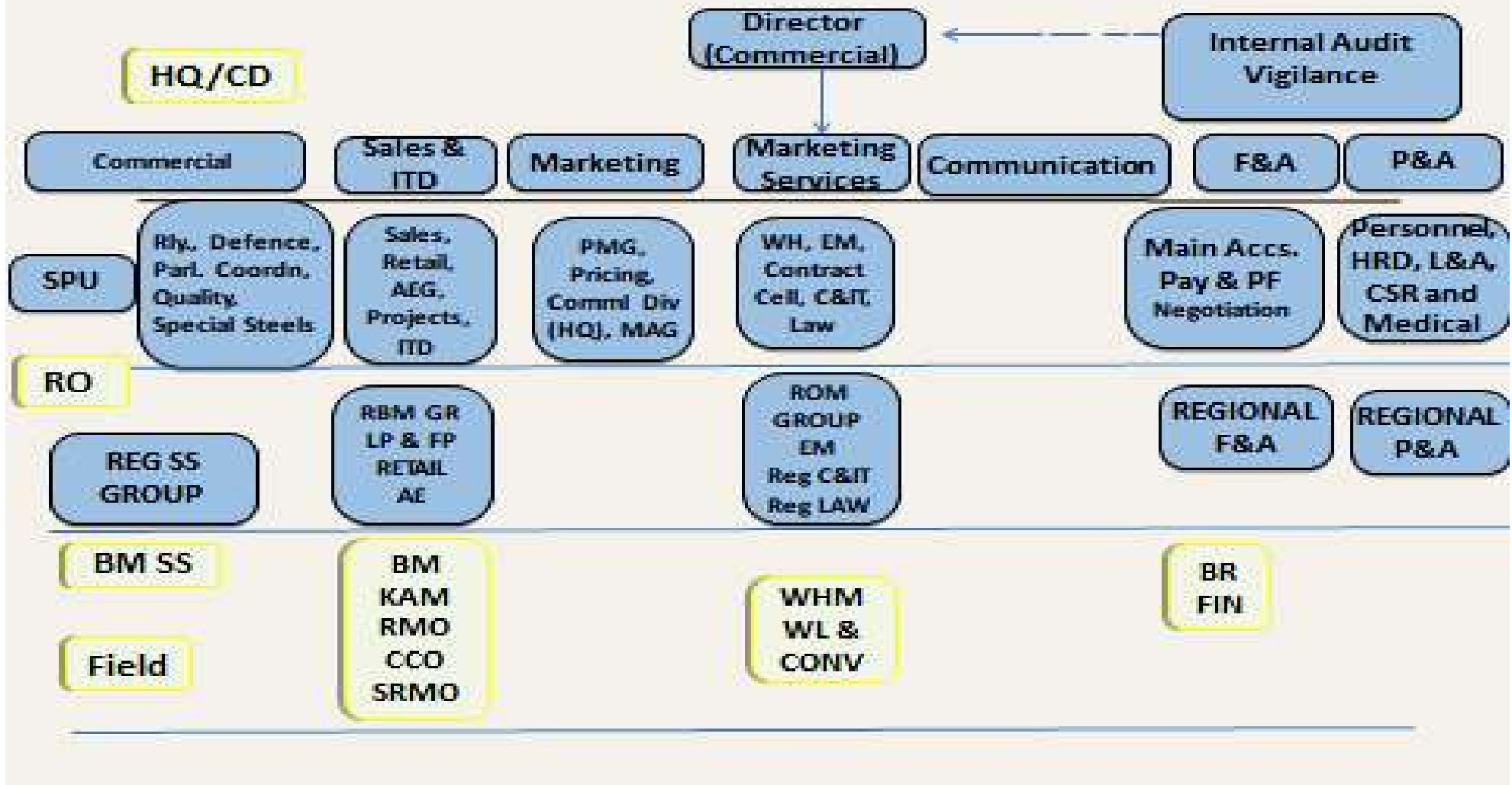
Organisational Chart
Alloy Steels Plant

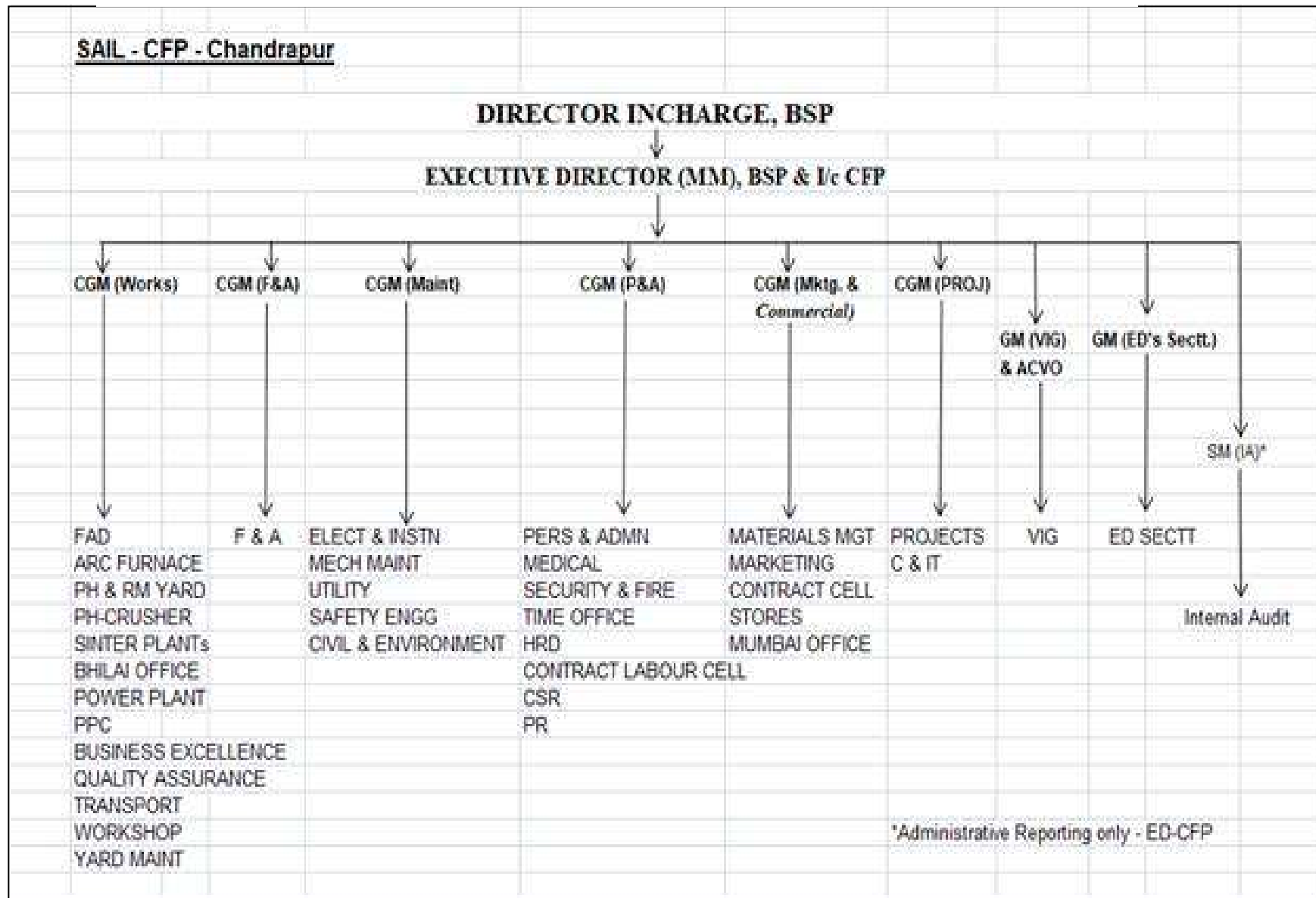


ORGANISATIONAL CHART OF SALEM STEEL PLANT

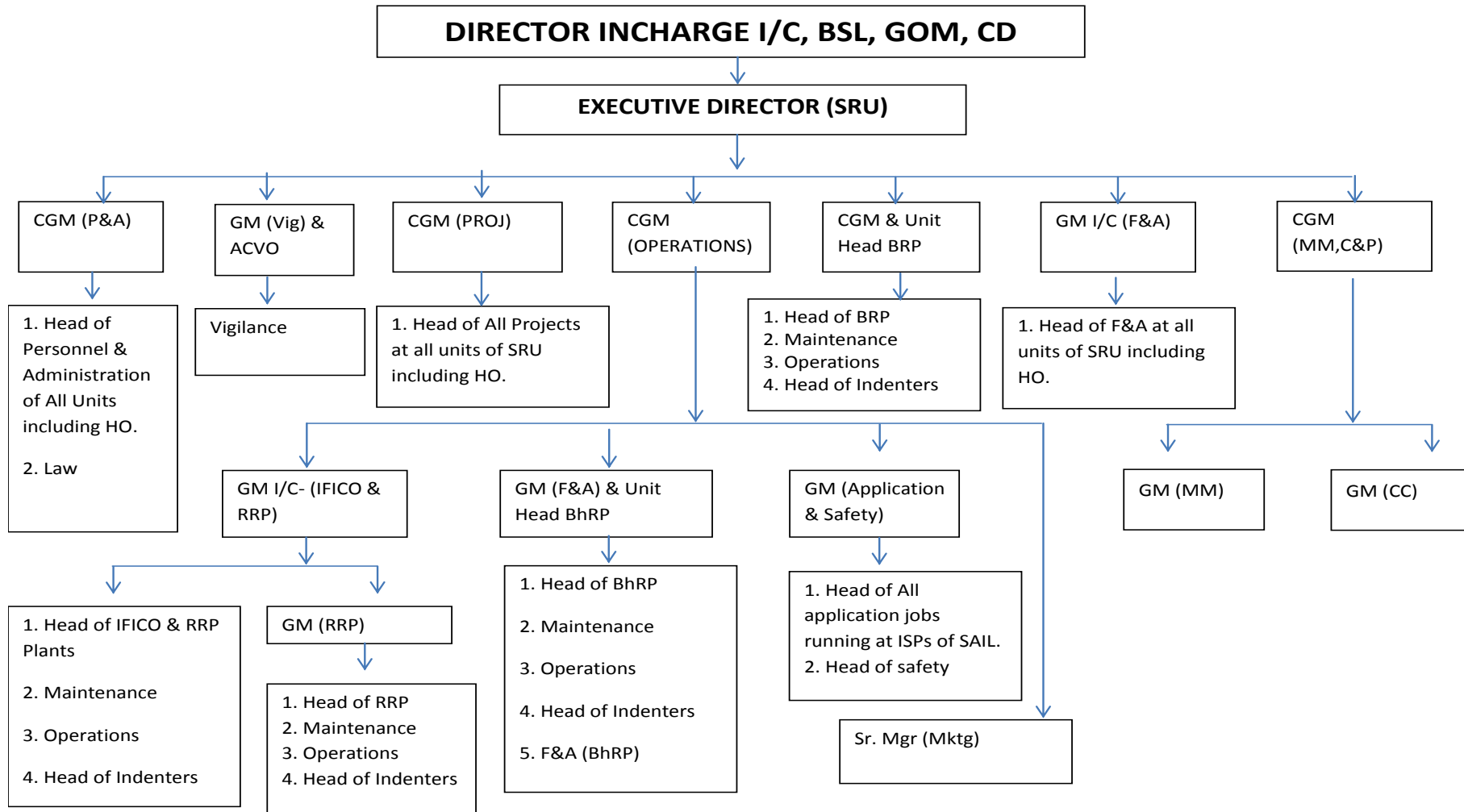


Existing Organisation Structure



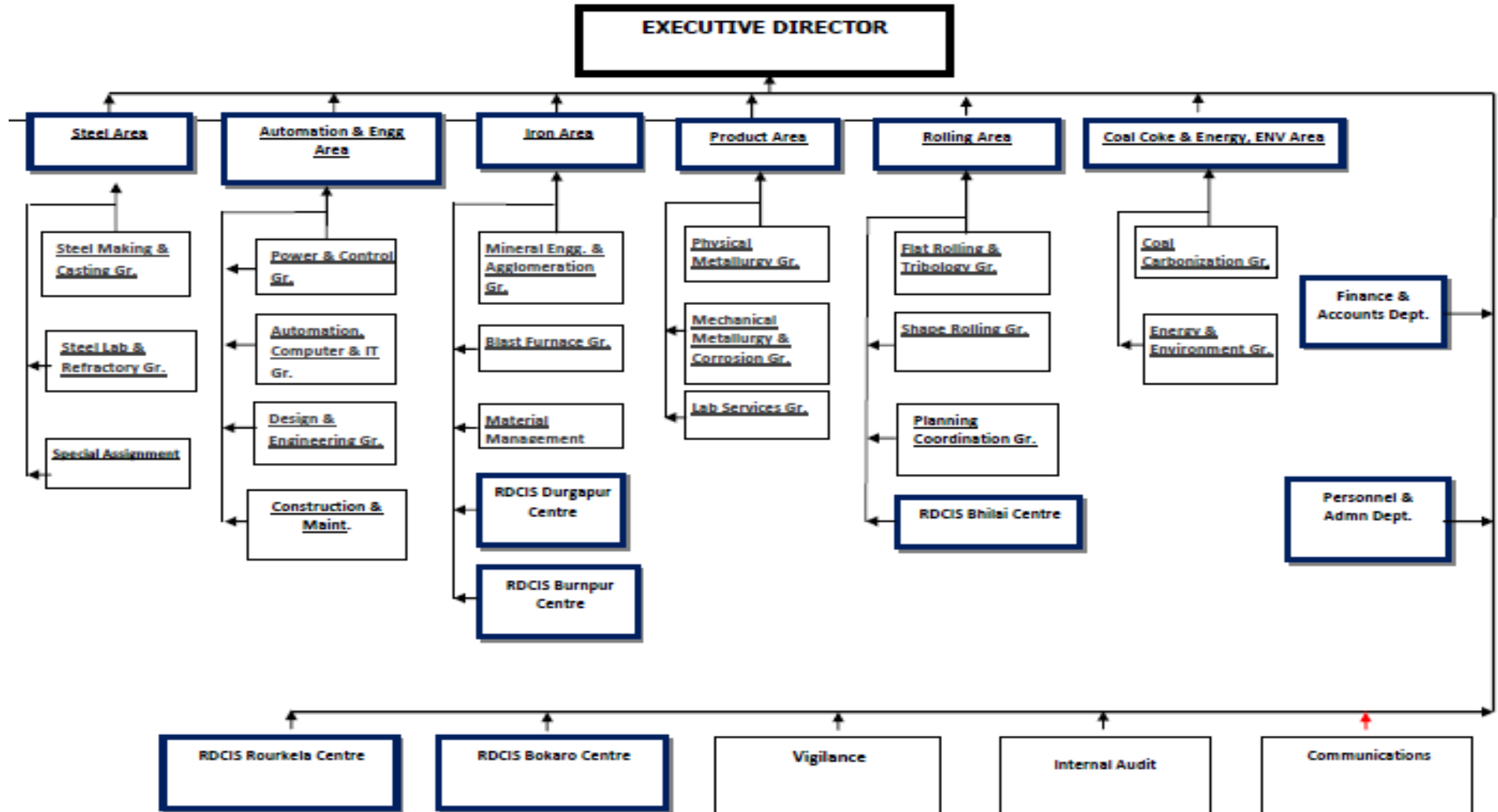


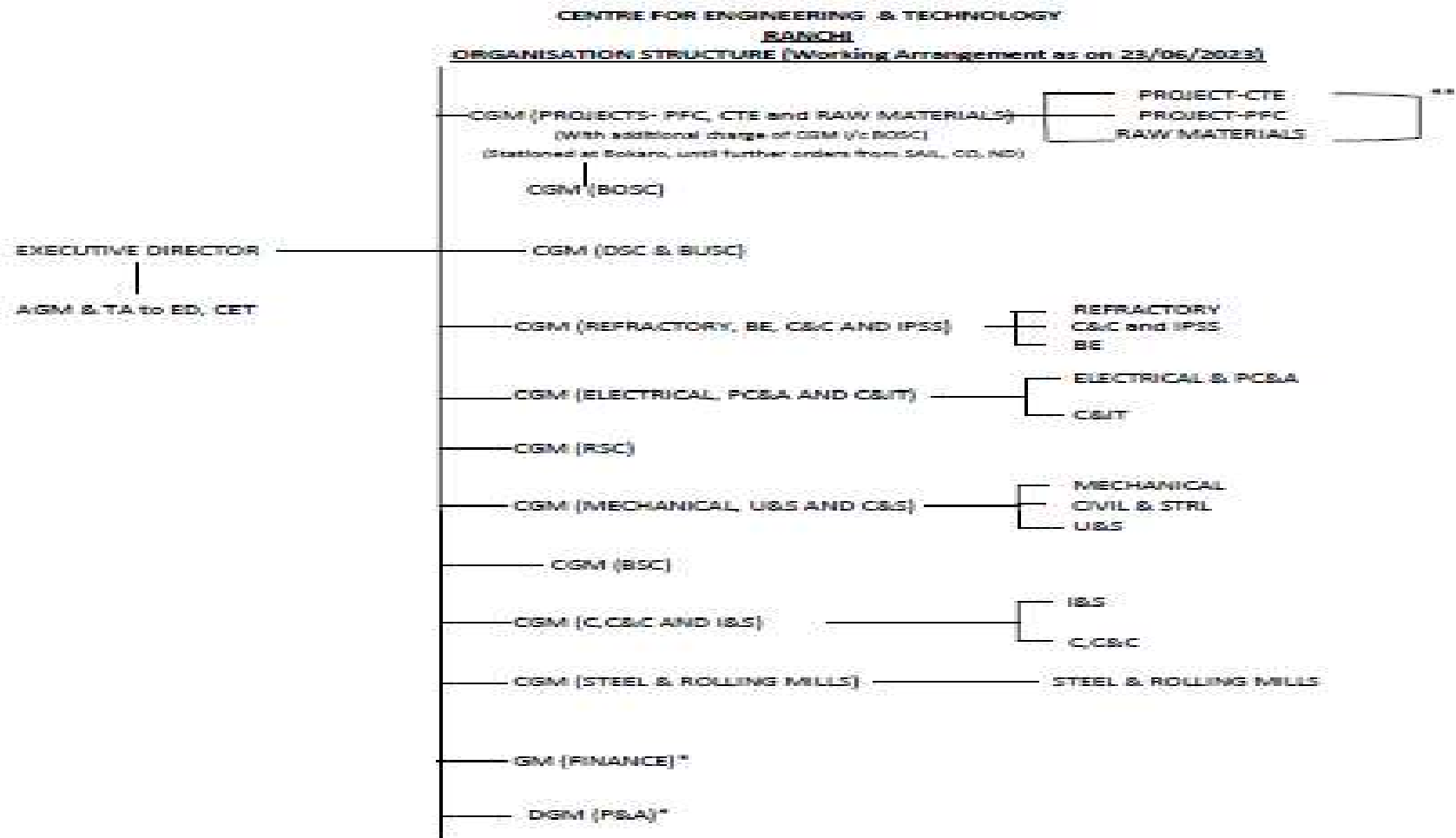
SAIL REFRACTORY UNIT



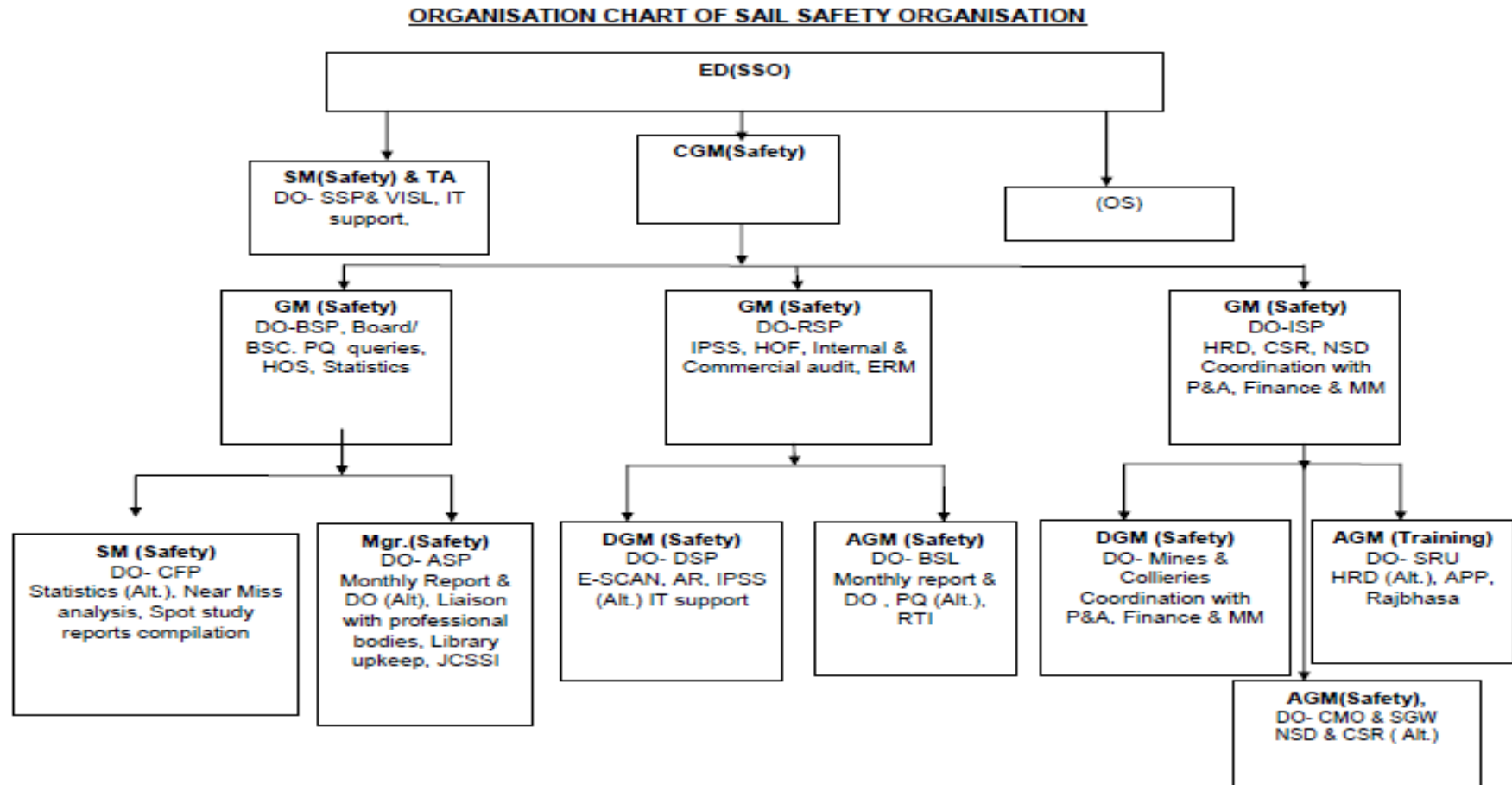
ORGANISATION STRUCTURE OF SAIL, RDCIS

As on

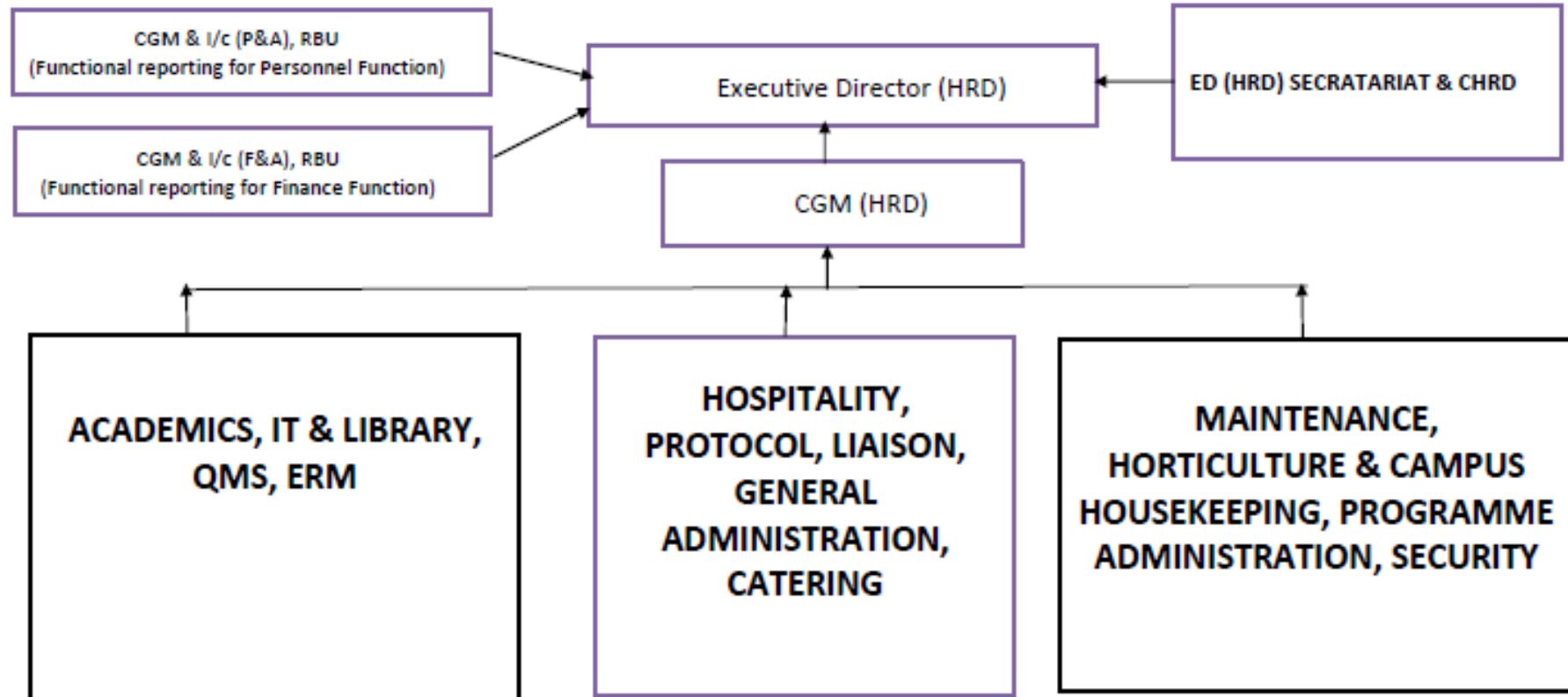


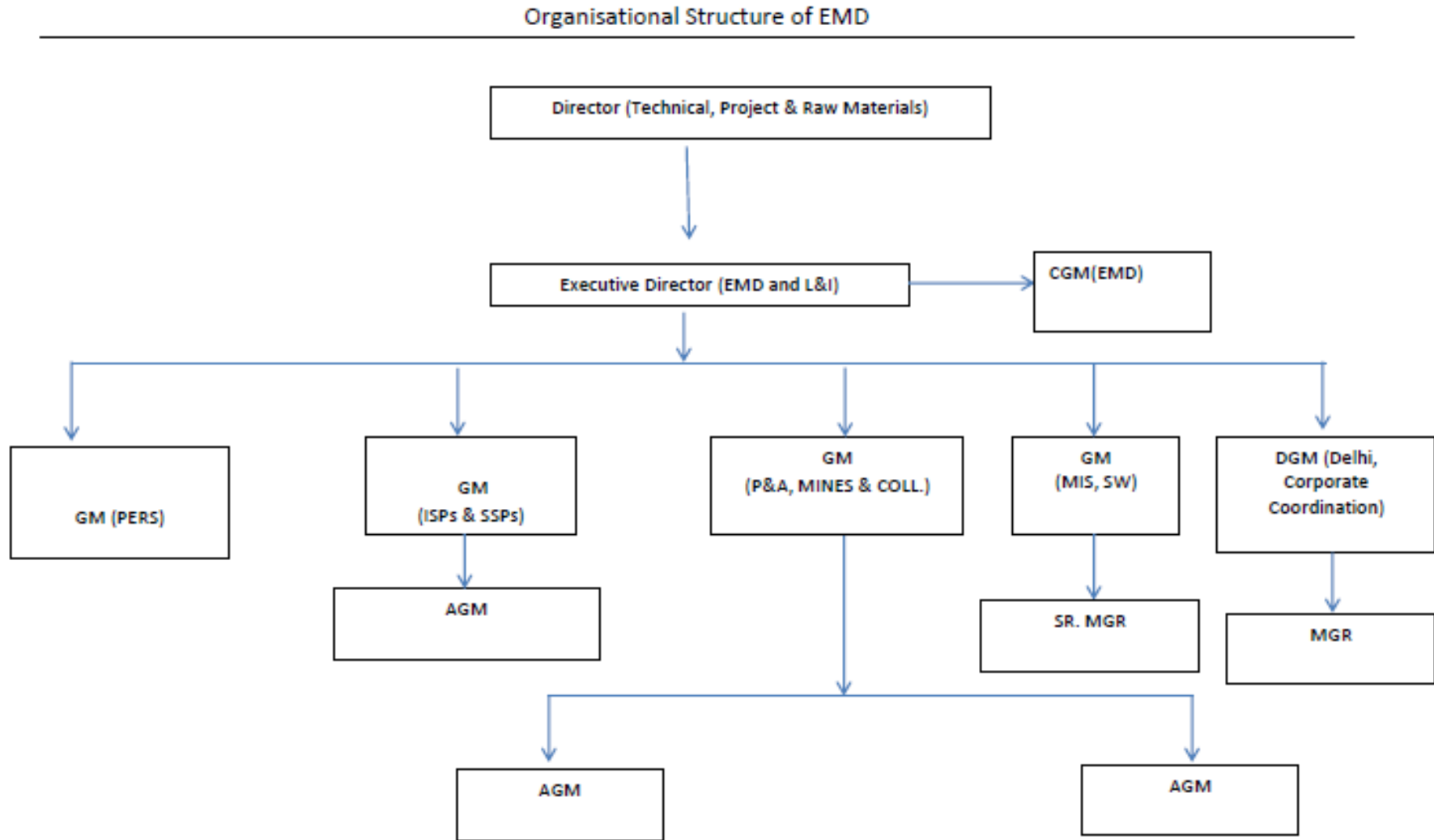


** As a temporary arrangement P-CTE, P-PFC and Raw Materials are reporting to CGM (Electrical, PCS&A and CS&IT) till CGM (P-PFC, P-CTE and Raw Materials) joins at CET Ranchi.



MTI ORGANISATION CHART

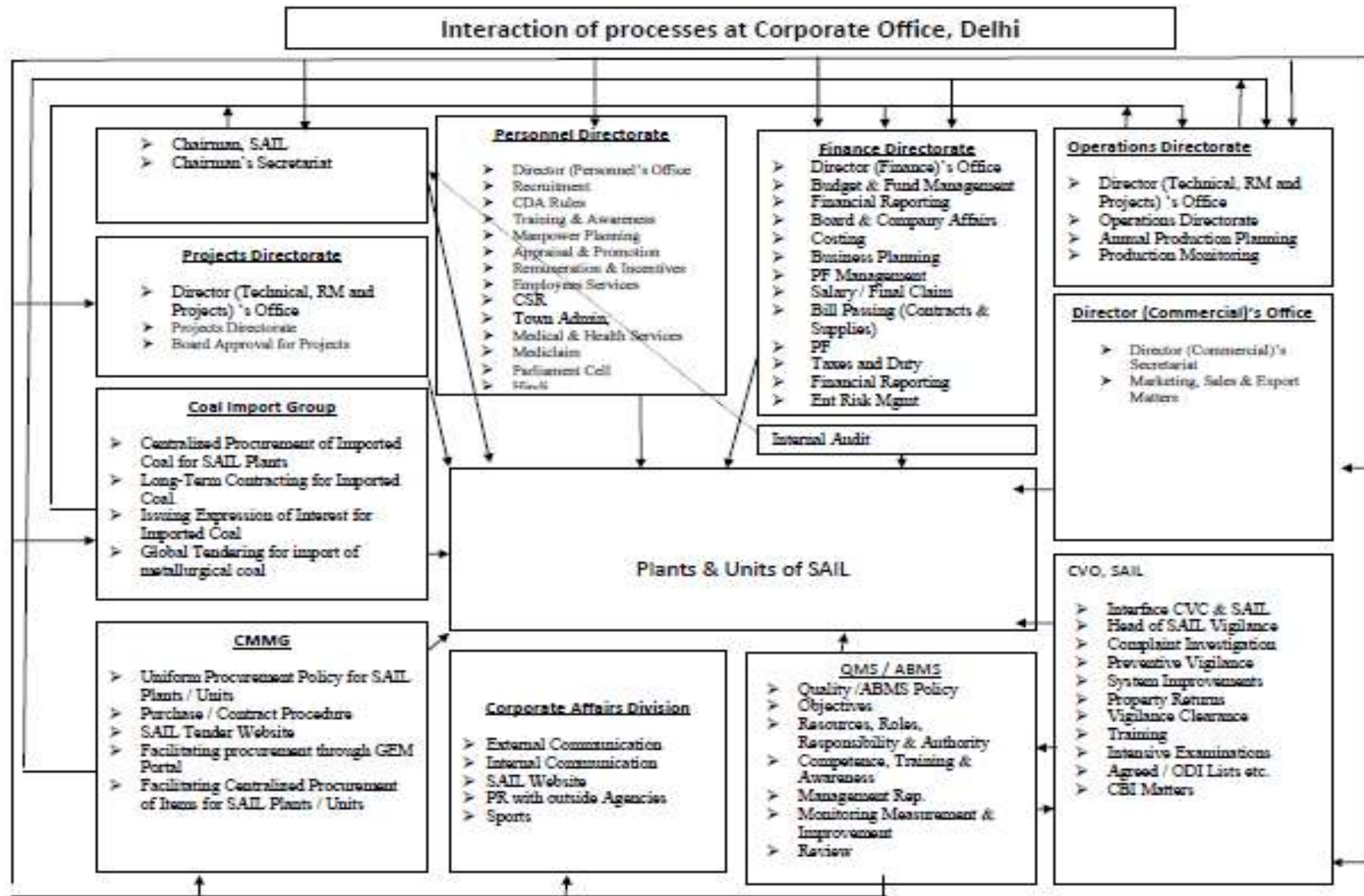


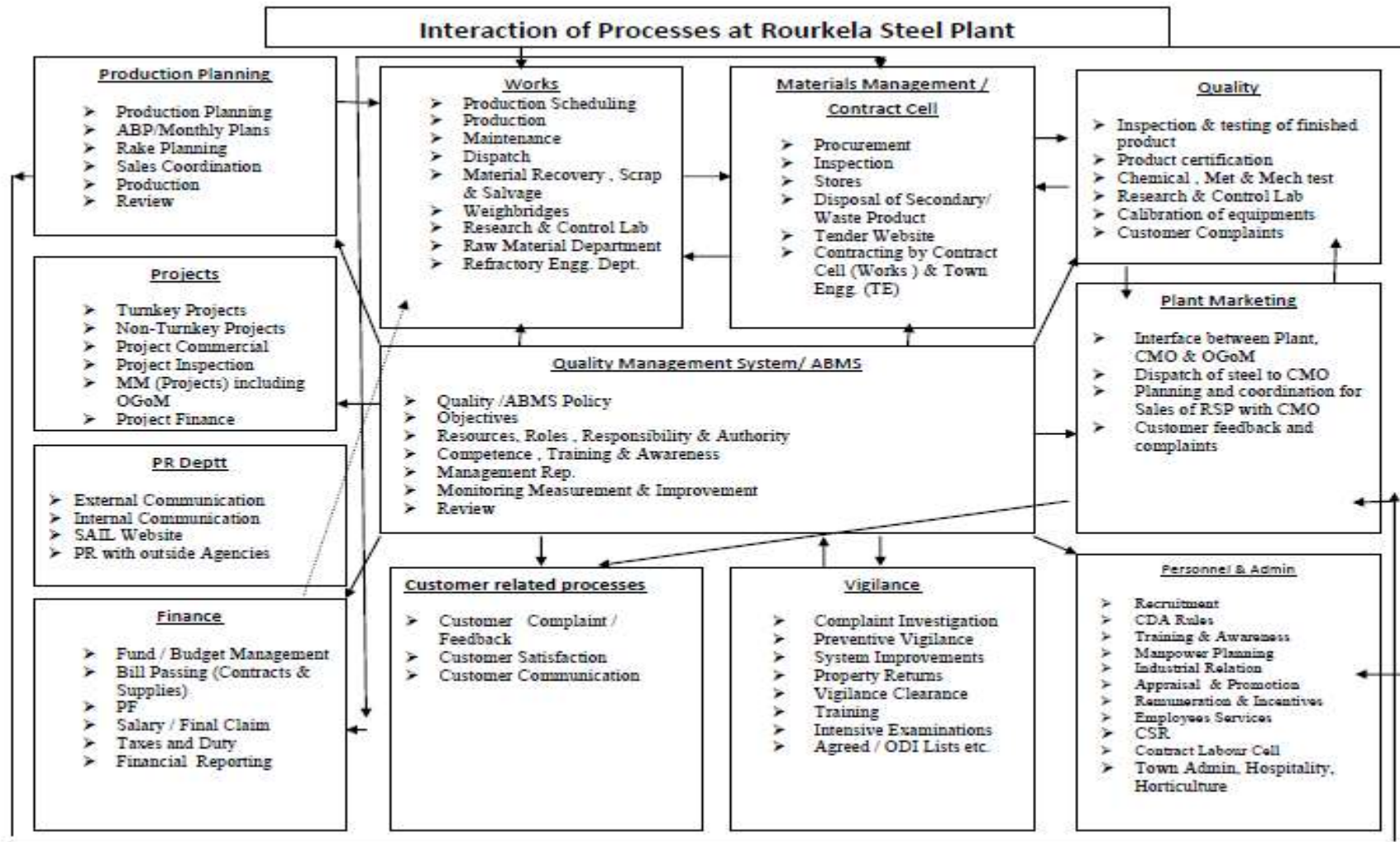


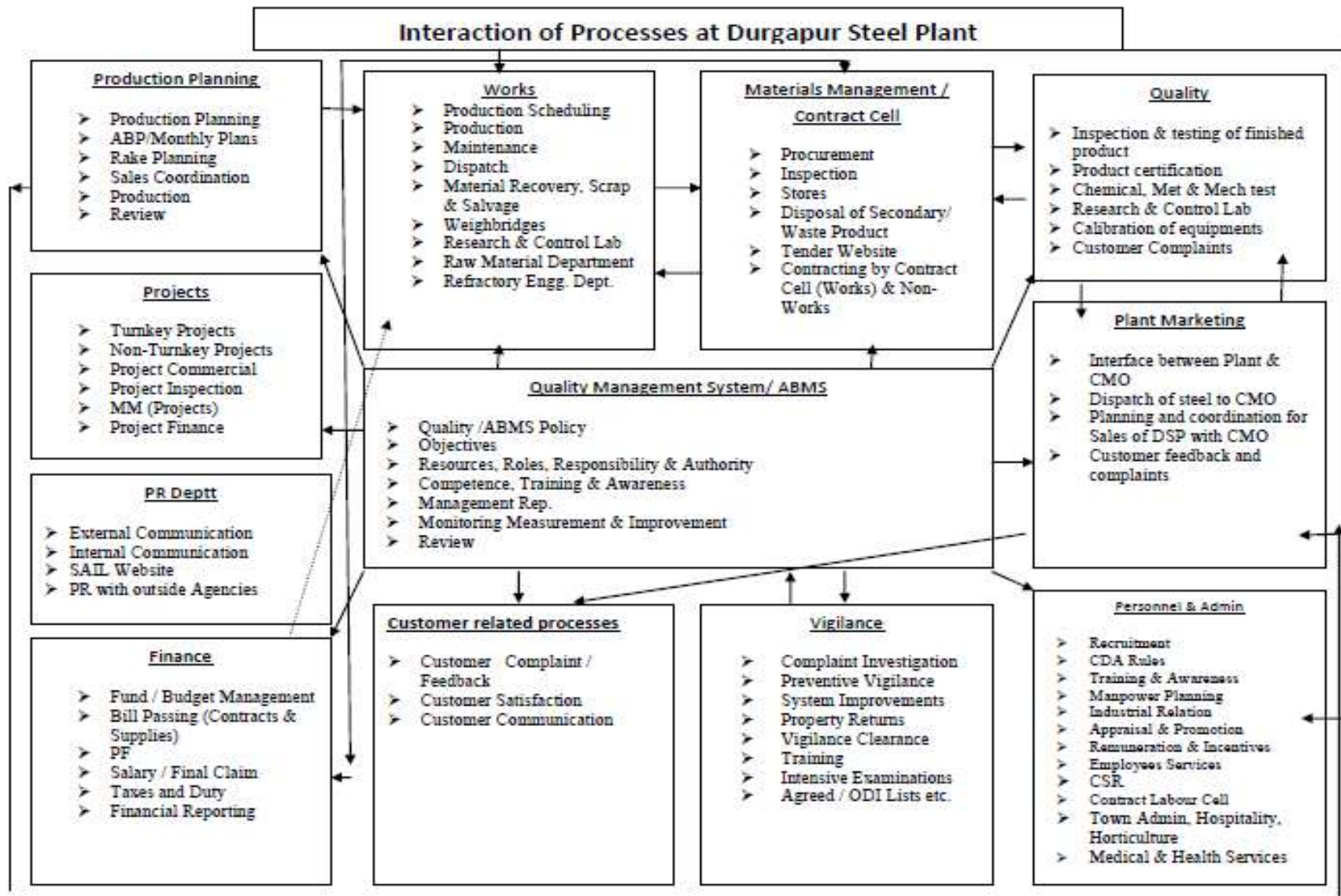
Annexure-3

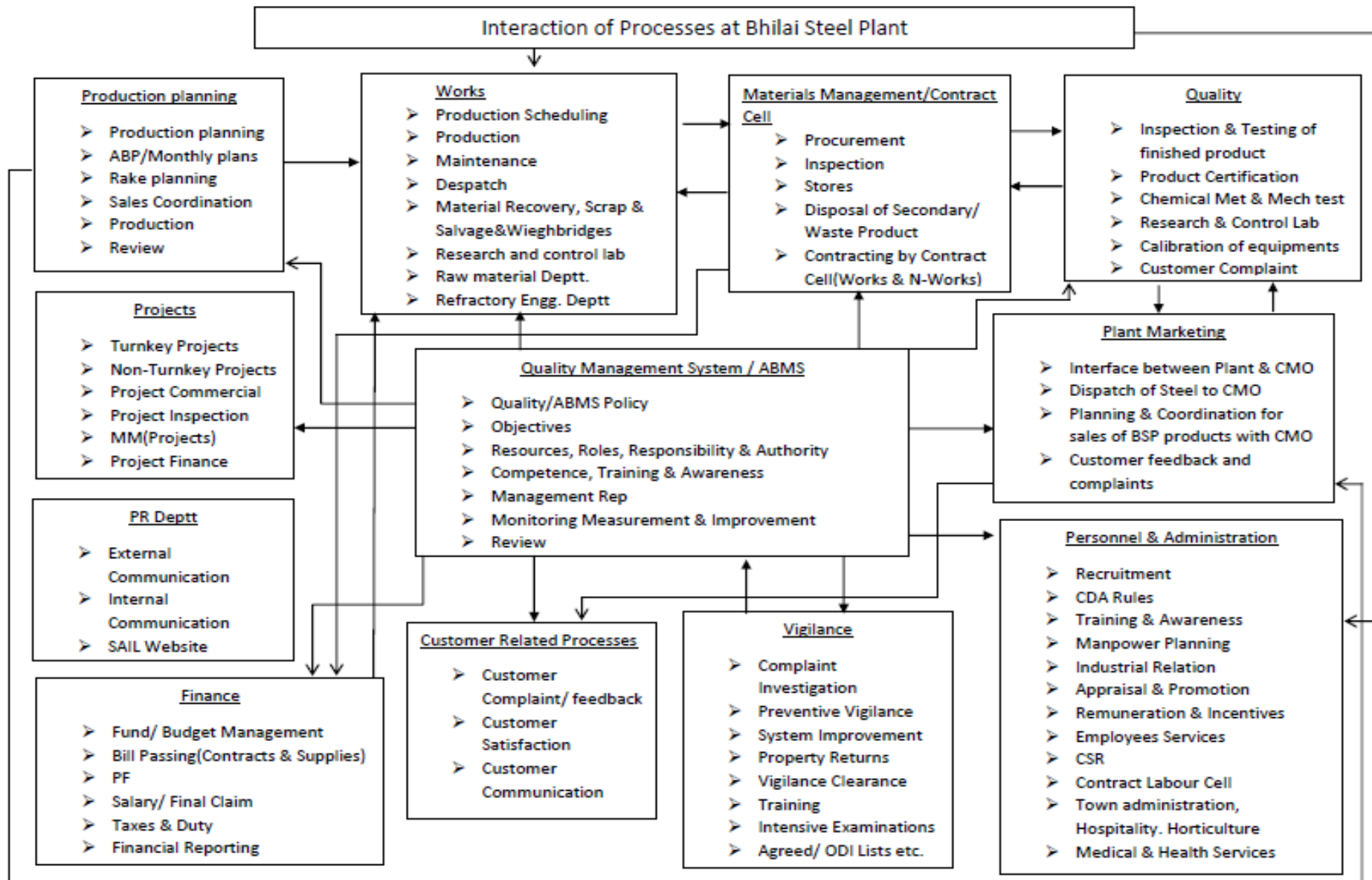
Interaction of Processes at SAIL Plants and Units					
S.No.	Doc. No.	Title	Version #	Date	Page No.
1	D/ABMS/IP/CO/Ver 1.0	Interaction of Processes at Corporate Office	02	01.09.2022	73
2	D/ABMS/IP/RSP/Ver 1.0	Interaction of Processes at RSP	01	11.07.2023	74
3	D/ABMS/IP/DSP/Ver 1.0	Interaction of Processes at DSP	01	11.07.2023	75
4	D/ABMS/IP/BSP/Ver 1.0	Interaction of Processes at BSP	01	11.07.2023	76
5	D/ABMS/IP/BSL/Ver 1.0	Interaction of Processes at BSL	02	01.09.2022	77
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7	D/ABMS/IP/ASP/Ver 1.0	Interaction of Processes at ASP	01	11.07.2023	79-80
8	D/ABMS/IP/SSP/Ver 1.0	Interaction of Processes at SSP	01	11.07.2023	81
9	D/ABMS/IP/CMO/Ver 1.0	Interaction of Processes at CMO	01	11.07.2023	82
10	D/ABMS/IP/CFP/Ver 1.0	Interaction of Processes at CFP	01	11.07.2023	83
11	D/ABMS/IP/SRU/Ver 1.0	Interaction of Processes at SRU	01	11.07.2023	84
12	D/ABMS/IP/RDCIS/Ver 1.0	Interaction of Processes at RDCIS	01	11.07.2023	85
13	D/ABMS/IP/CET/Ver 1.0	Interaction of Processes at CET	01	11.07.2023	86
14	D/ABMS/IP/SSO/Ver 1.0	Interaction of Processes at SSO	01	11.07.2023	87
15	D/ABMS/IP/MTI/Ver 1.0	Interaction of Processes at MTI	01	11.07.2023	88
16	D/ABMS/IP/EMD/Ver 1.0	Interaction of Processes at EMD	01	11.07.2023	89

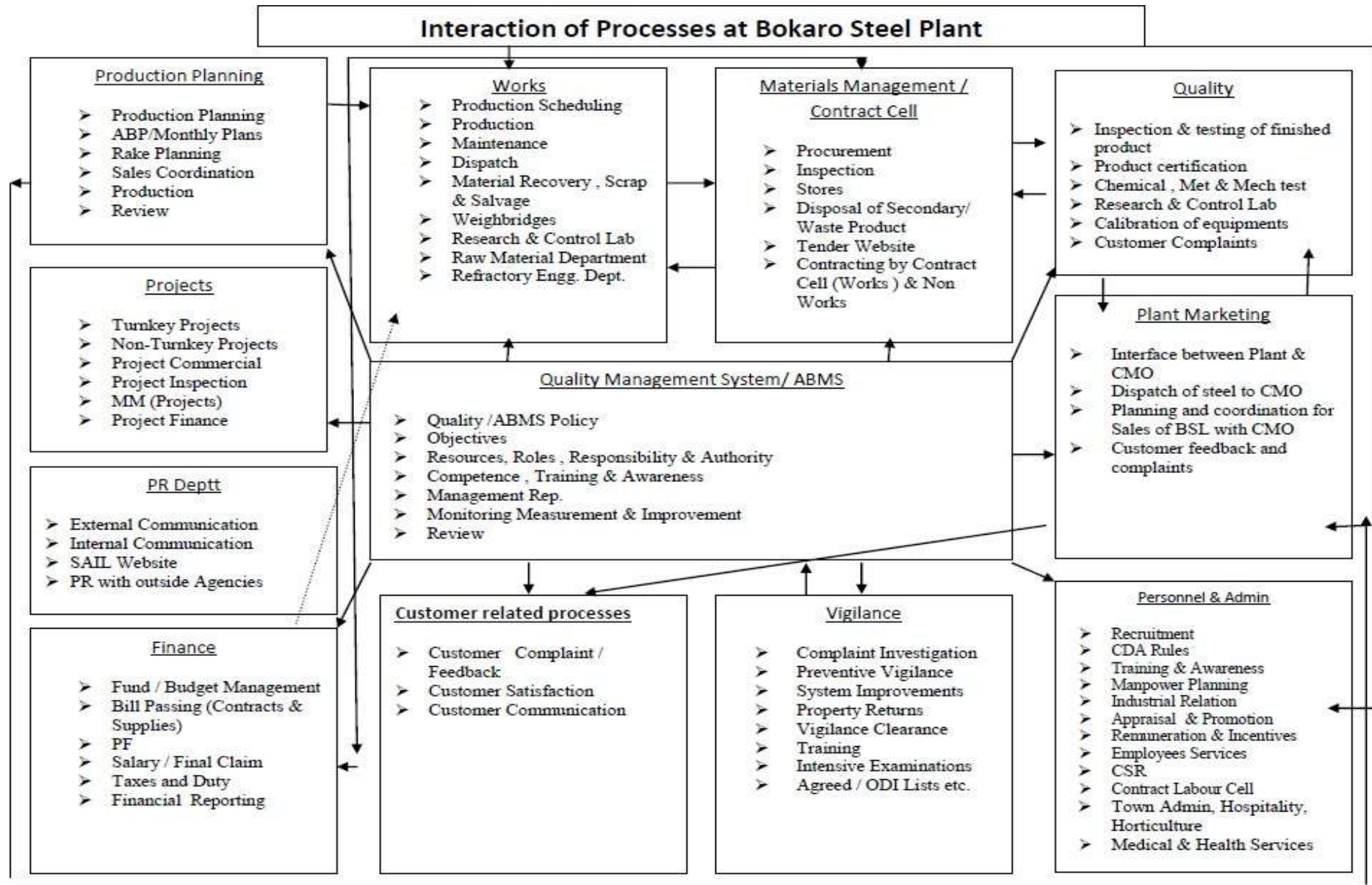
Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: Date:

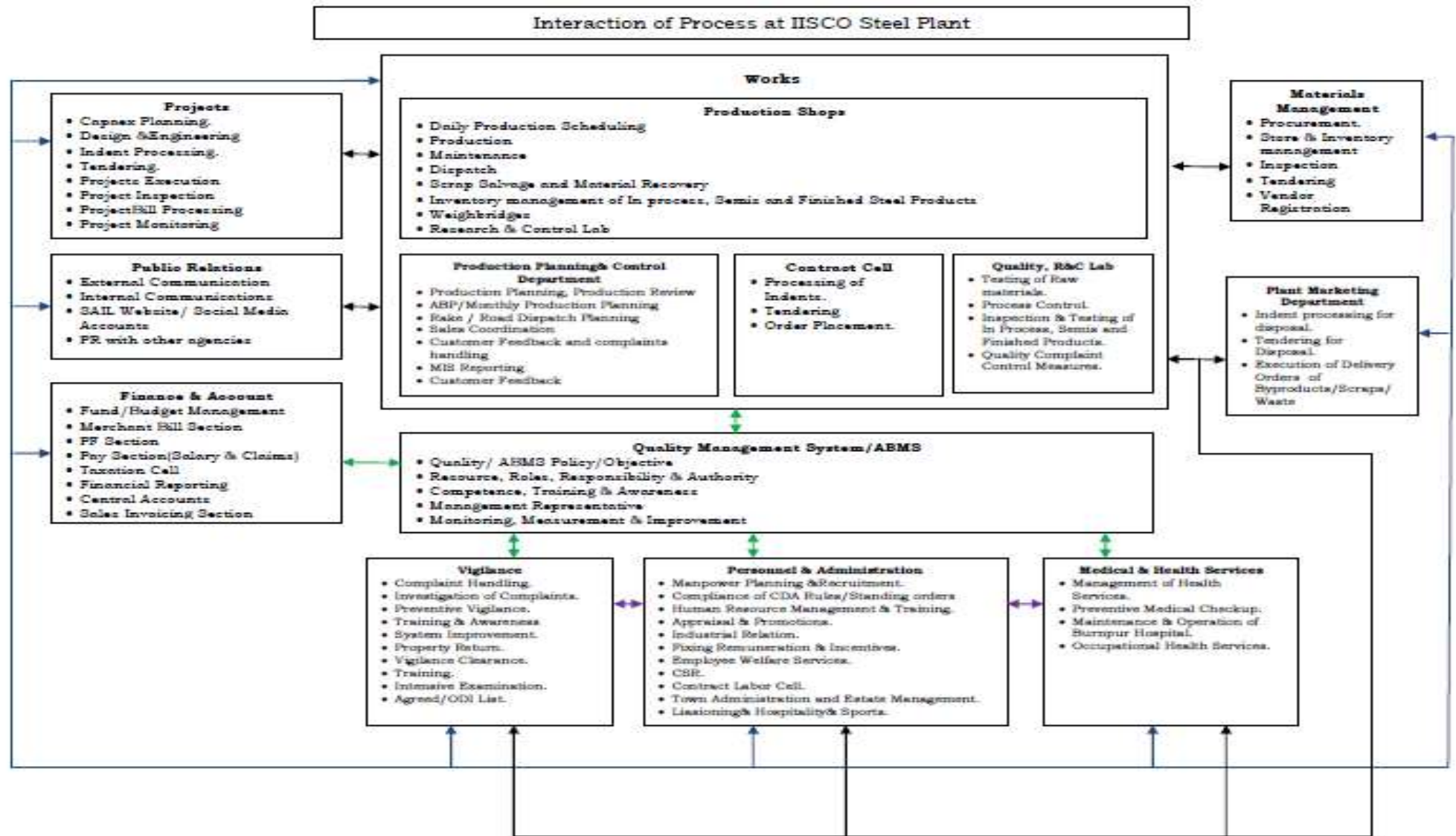


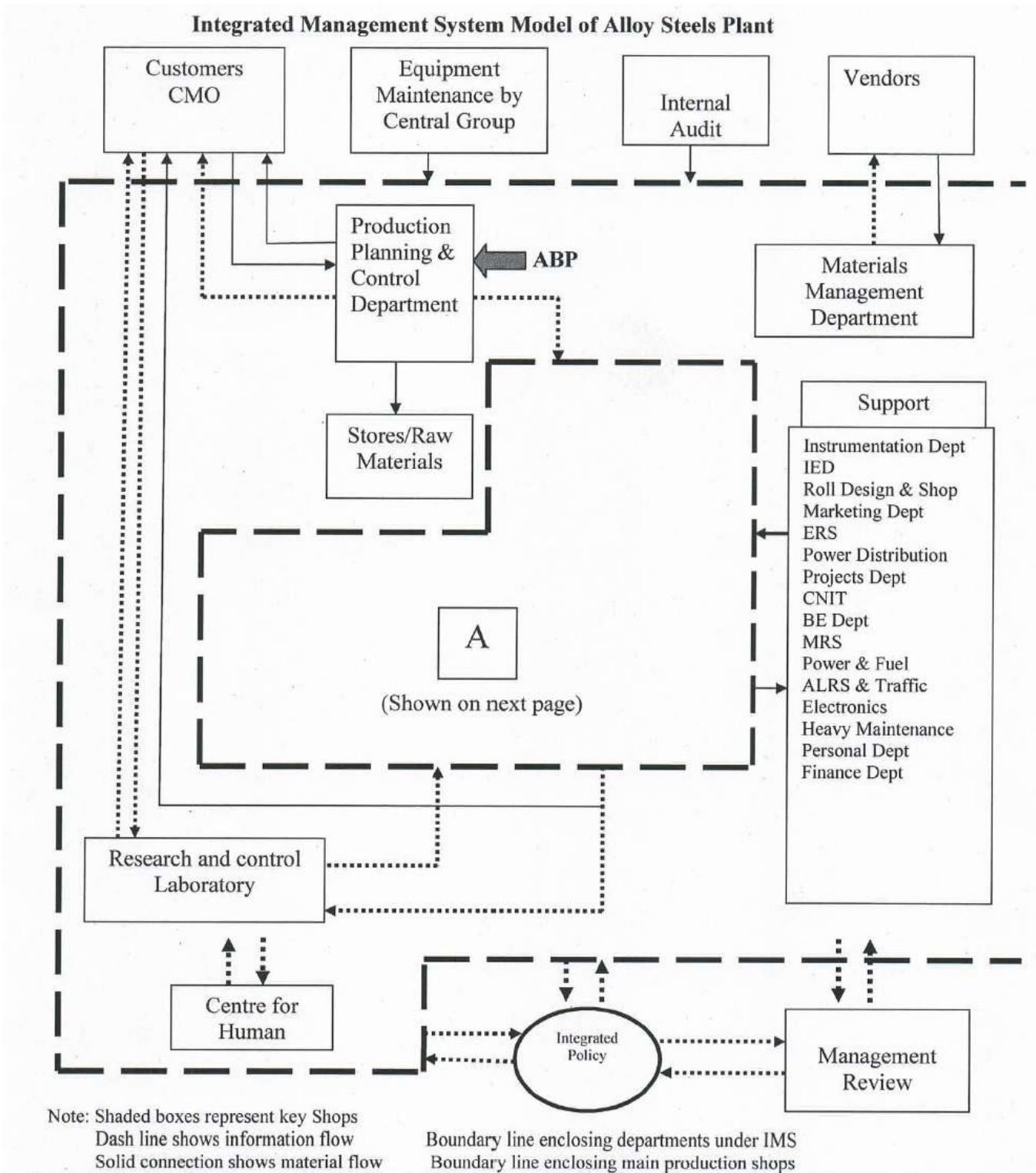


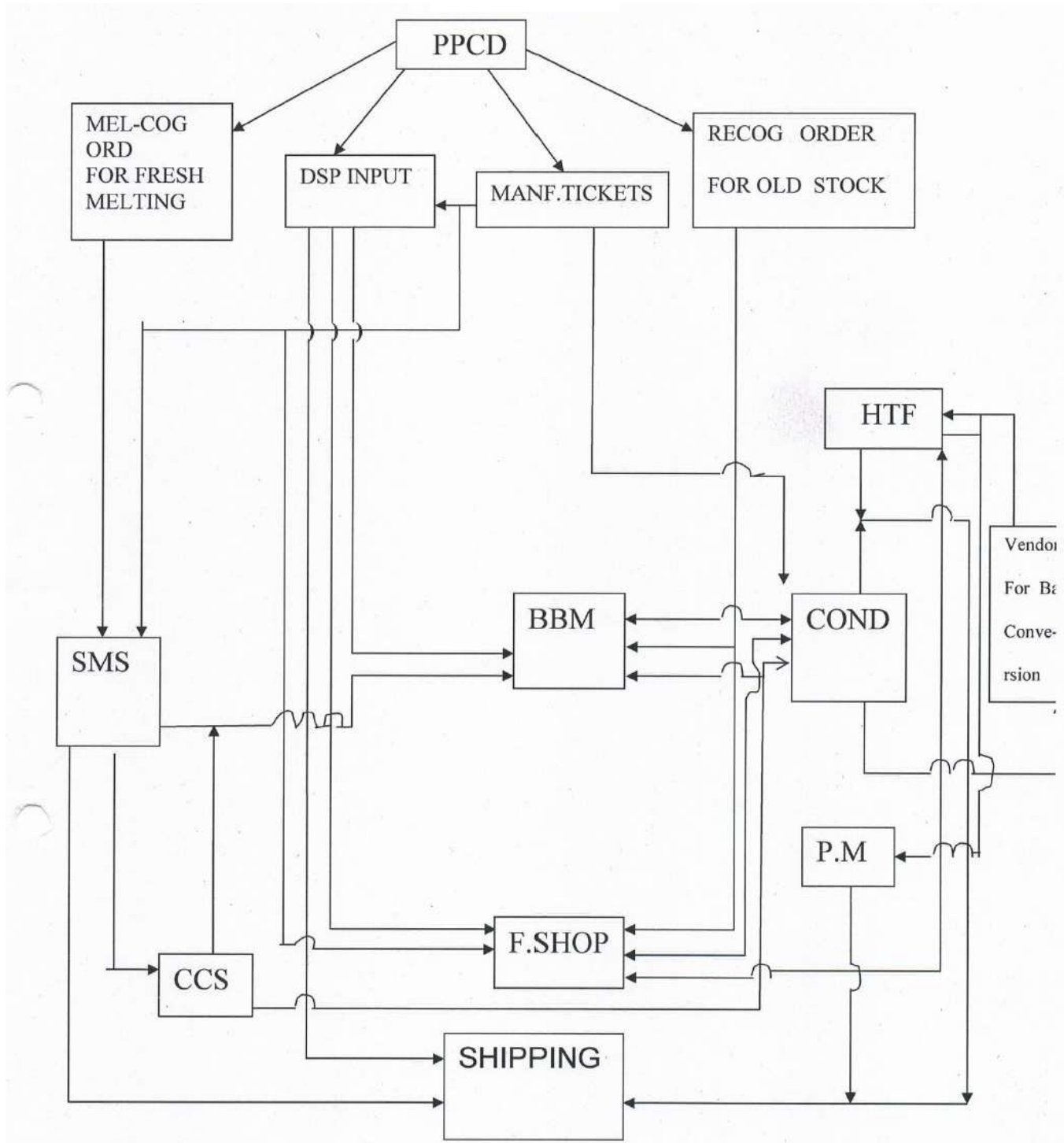


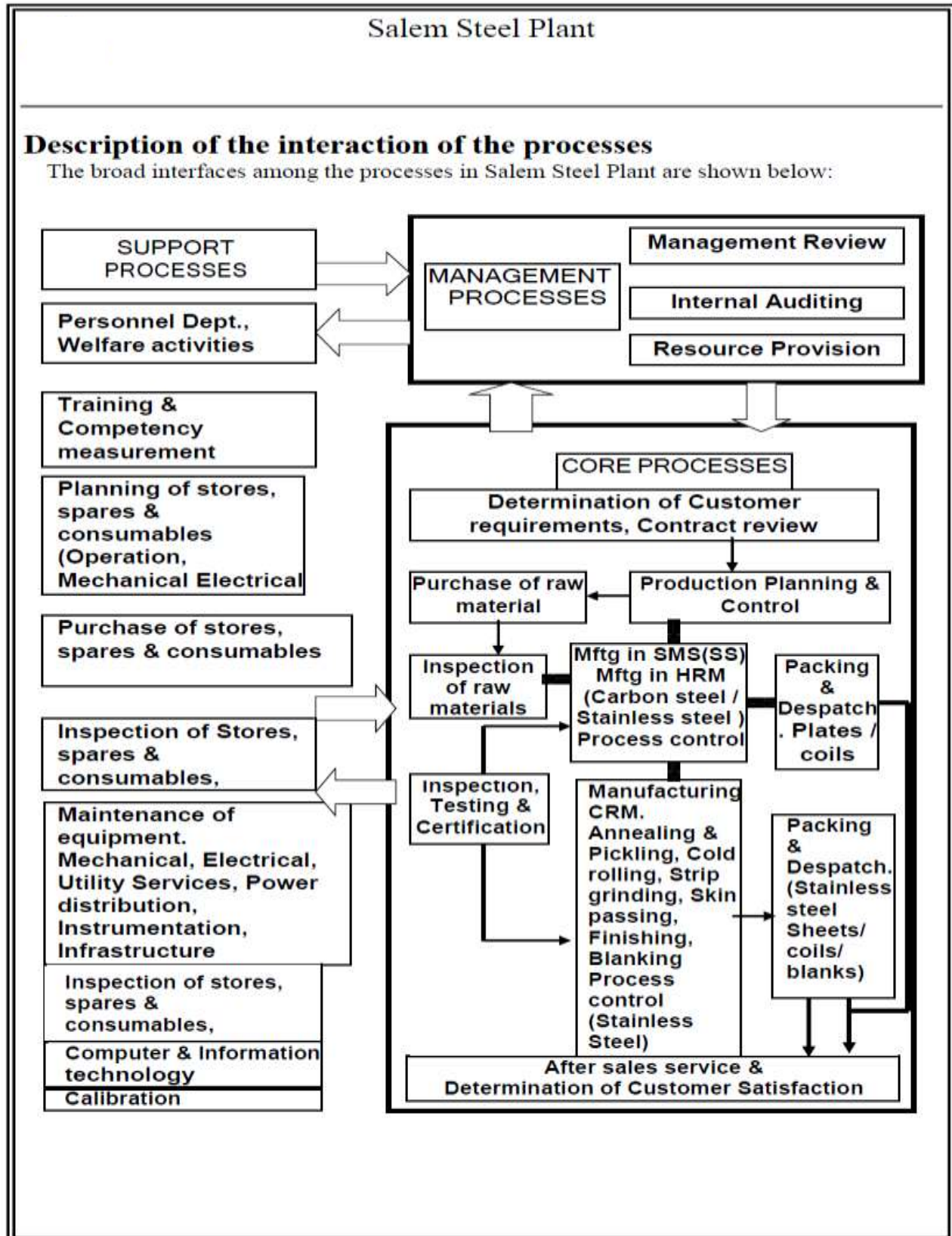




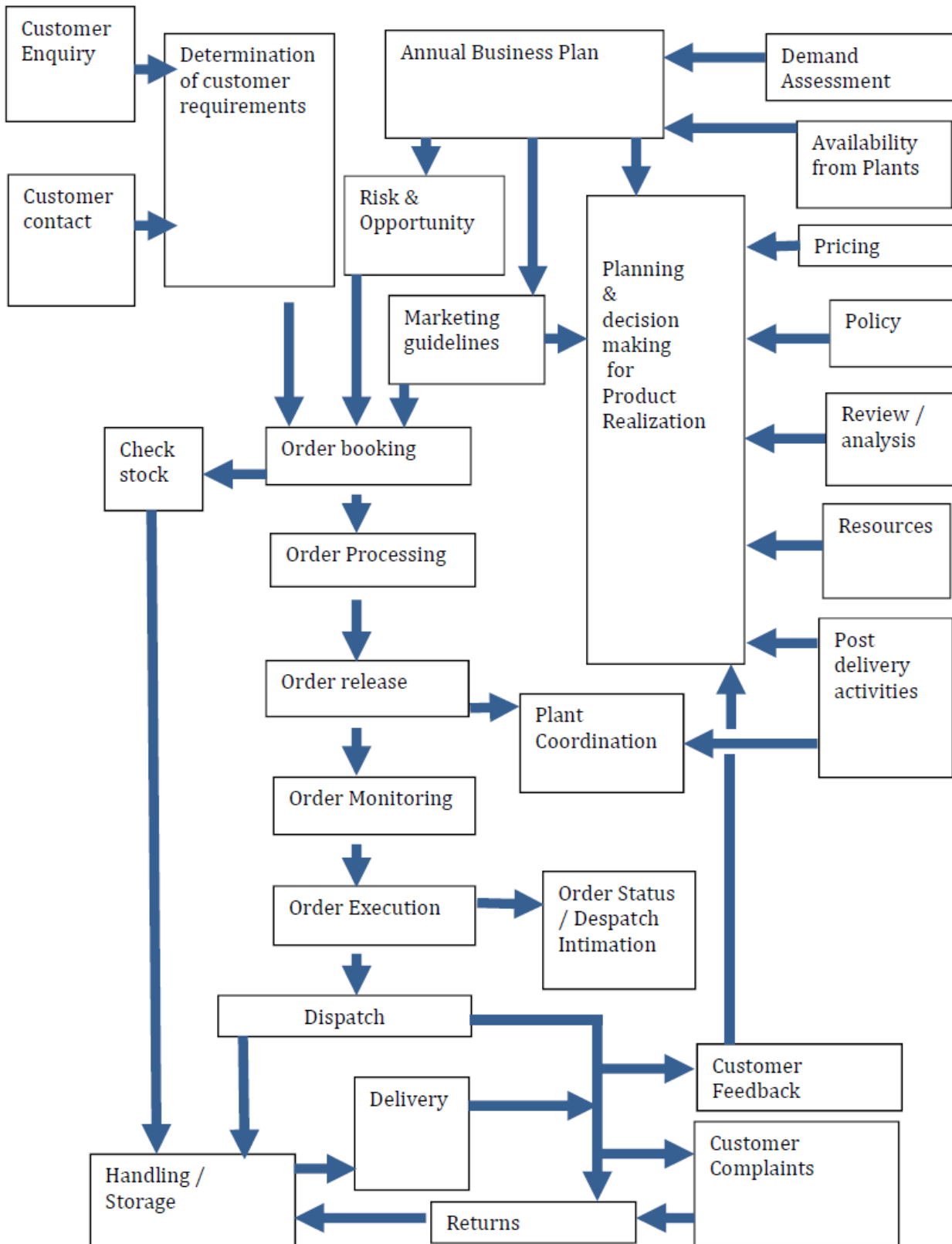


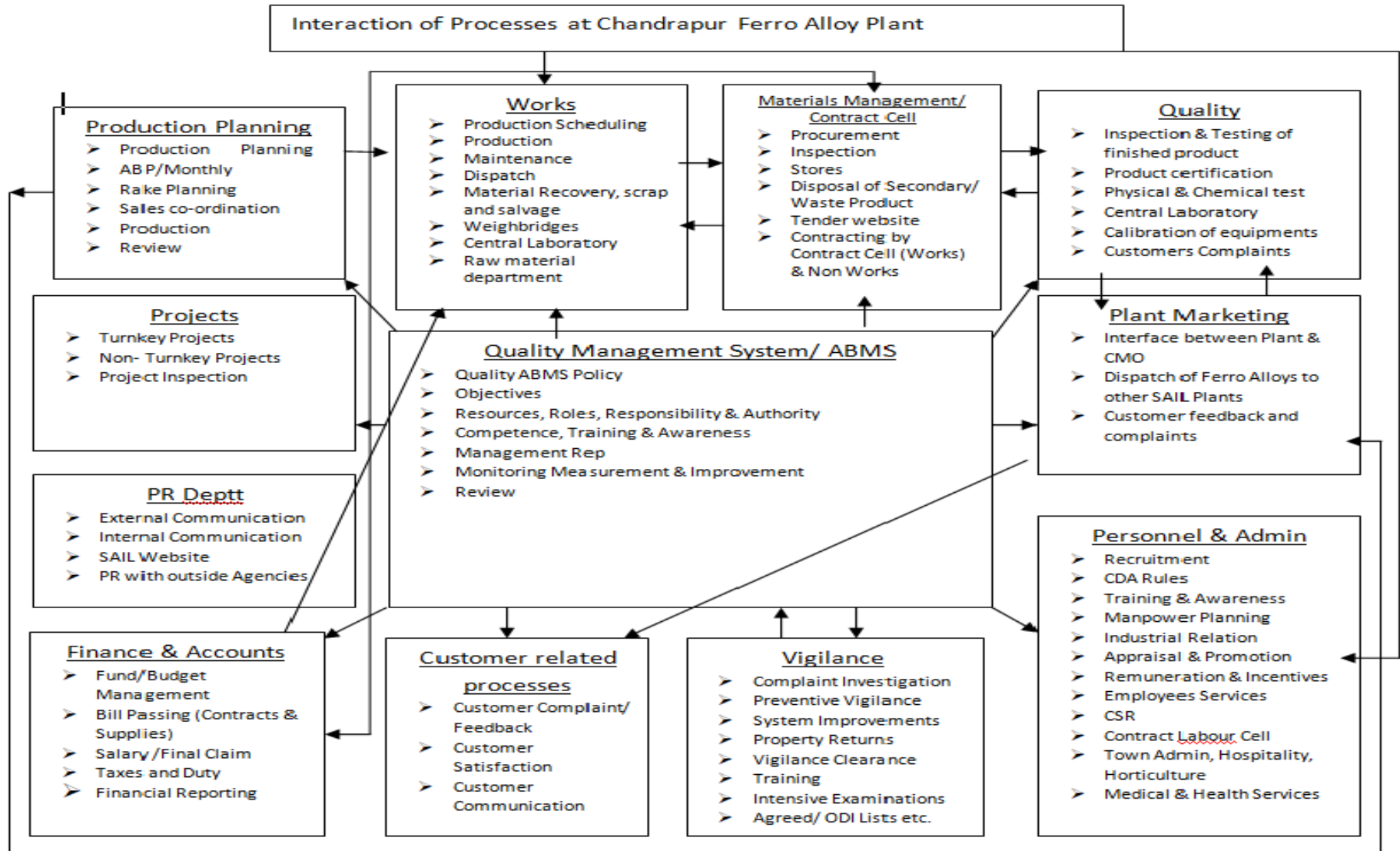


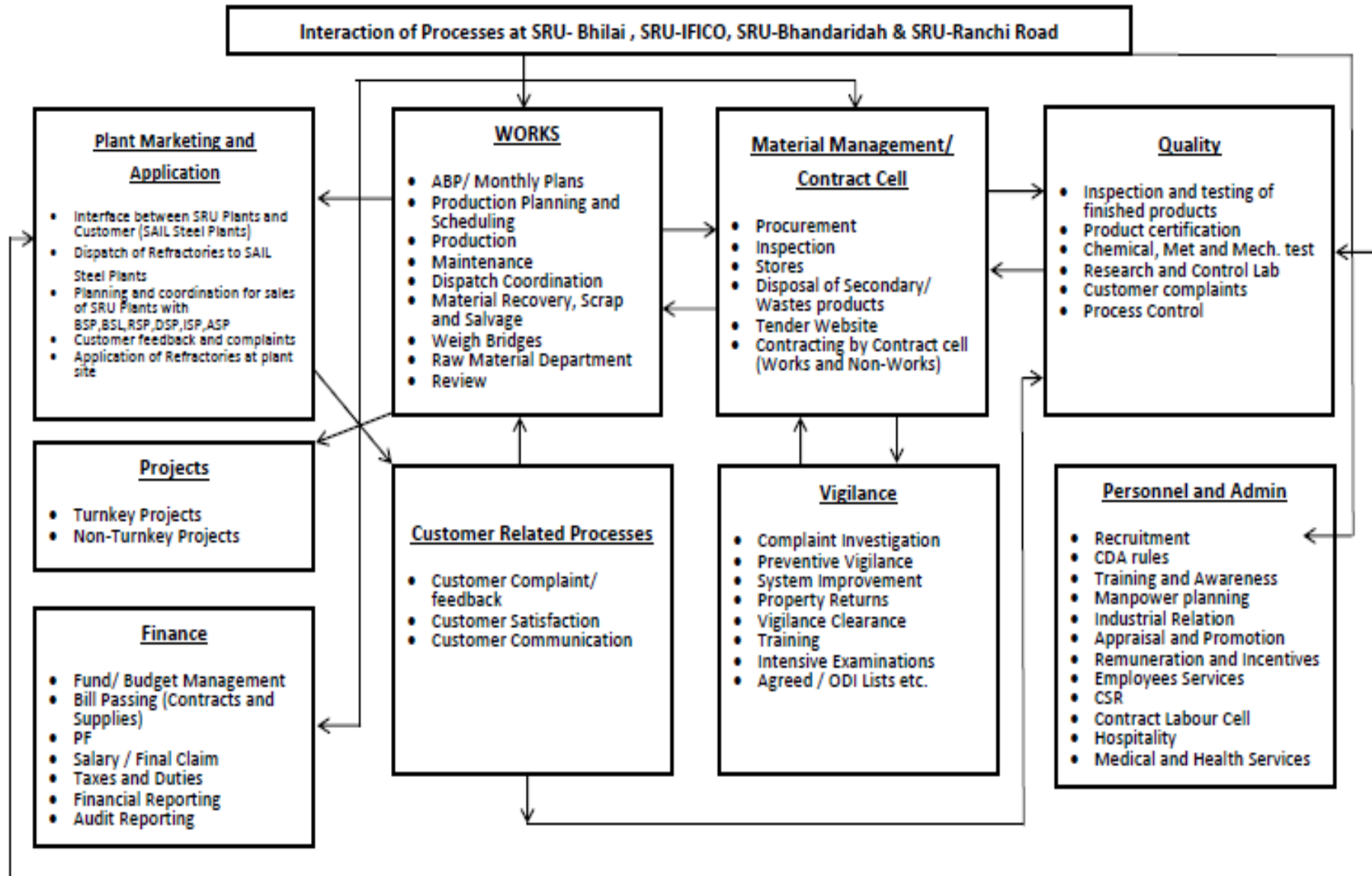


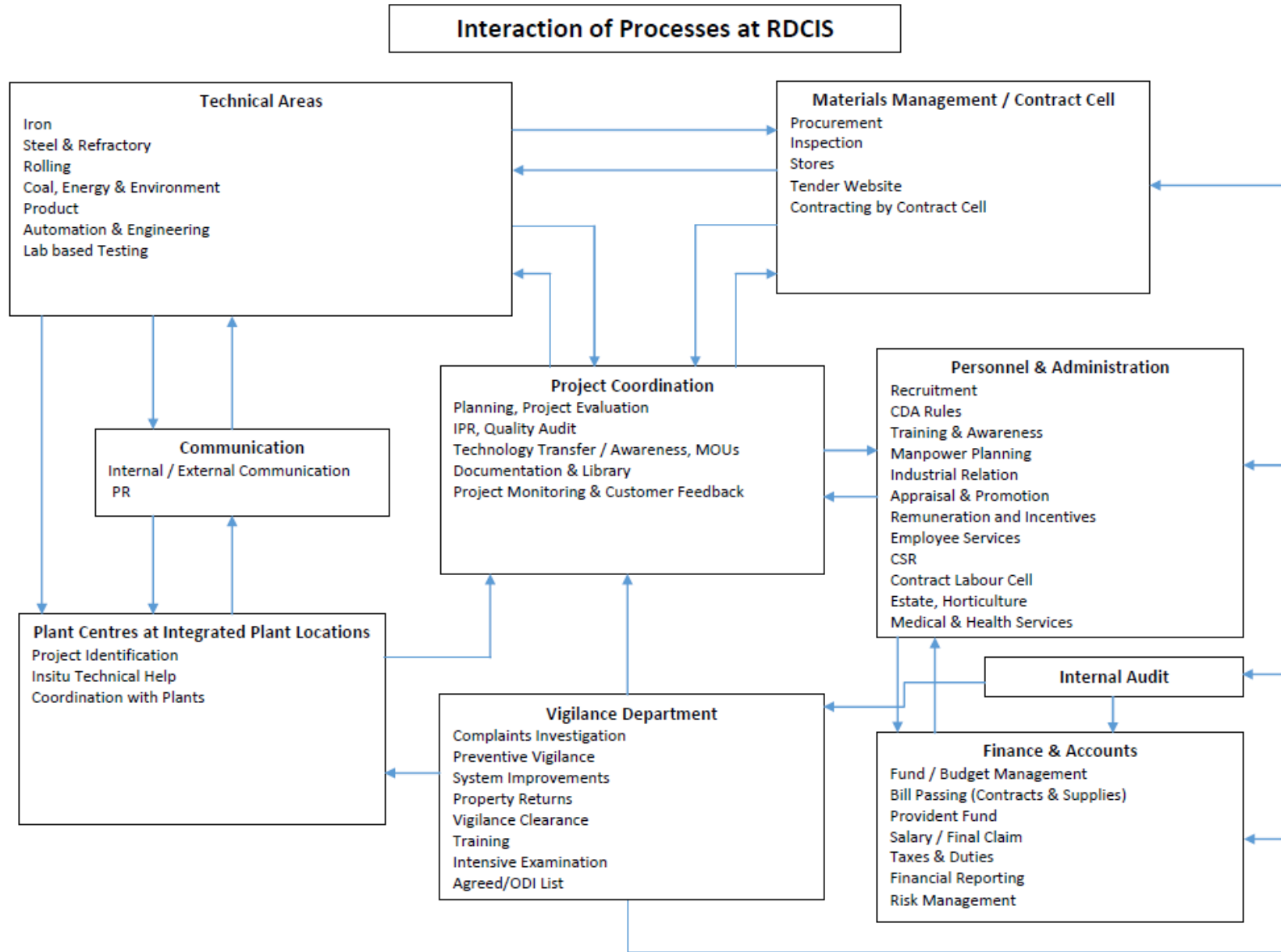


PROCESS FLOW CHART (CMO)

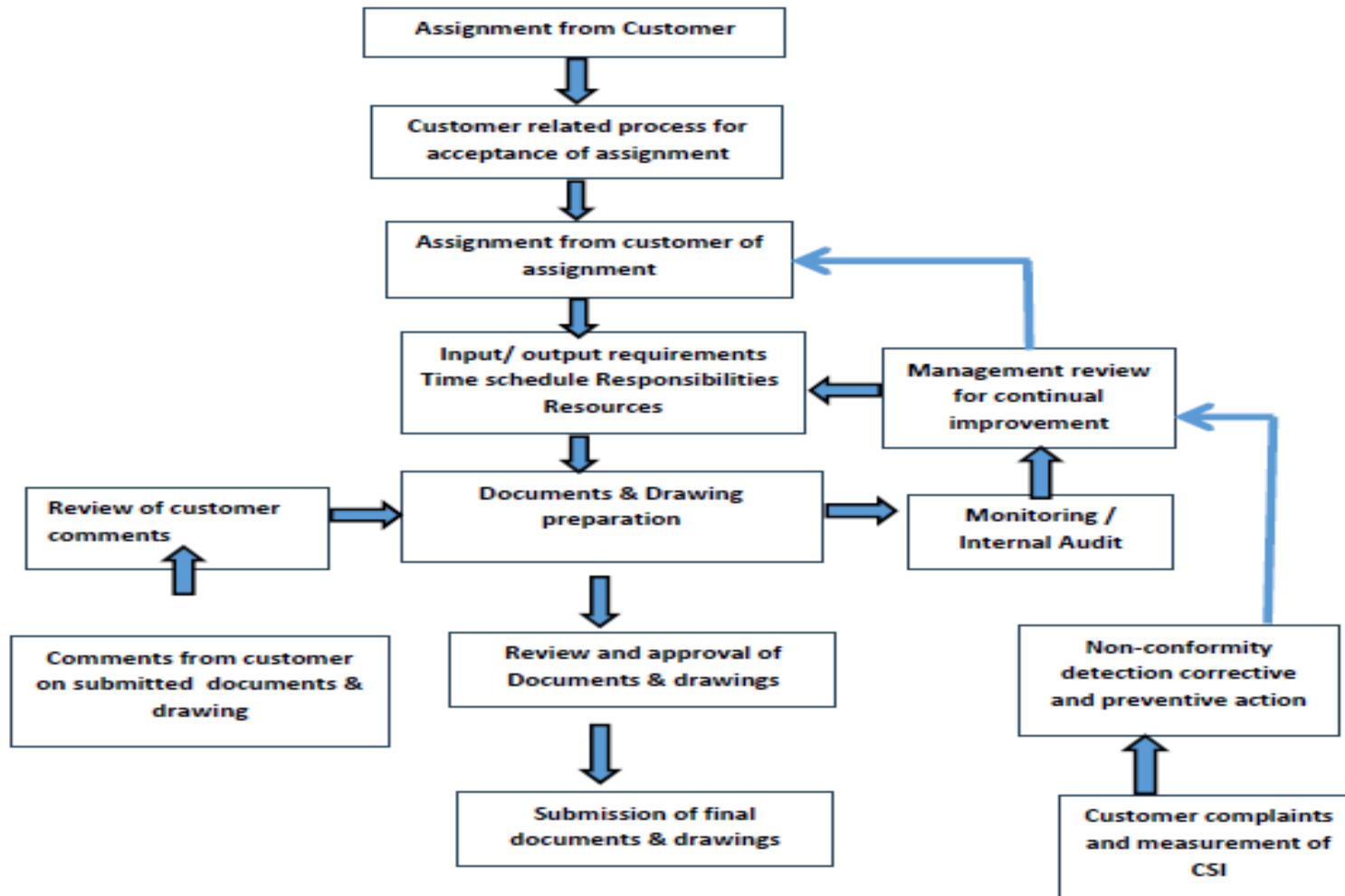


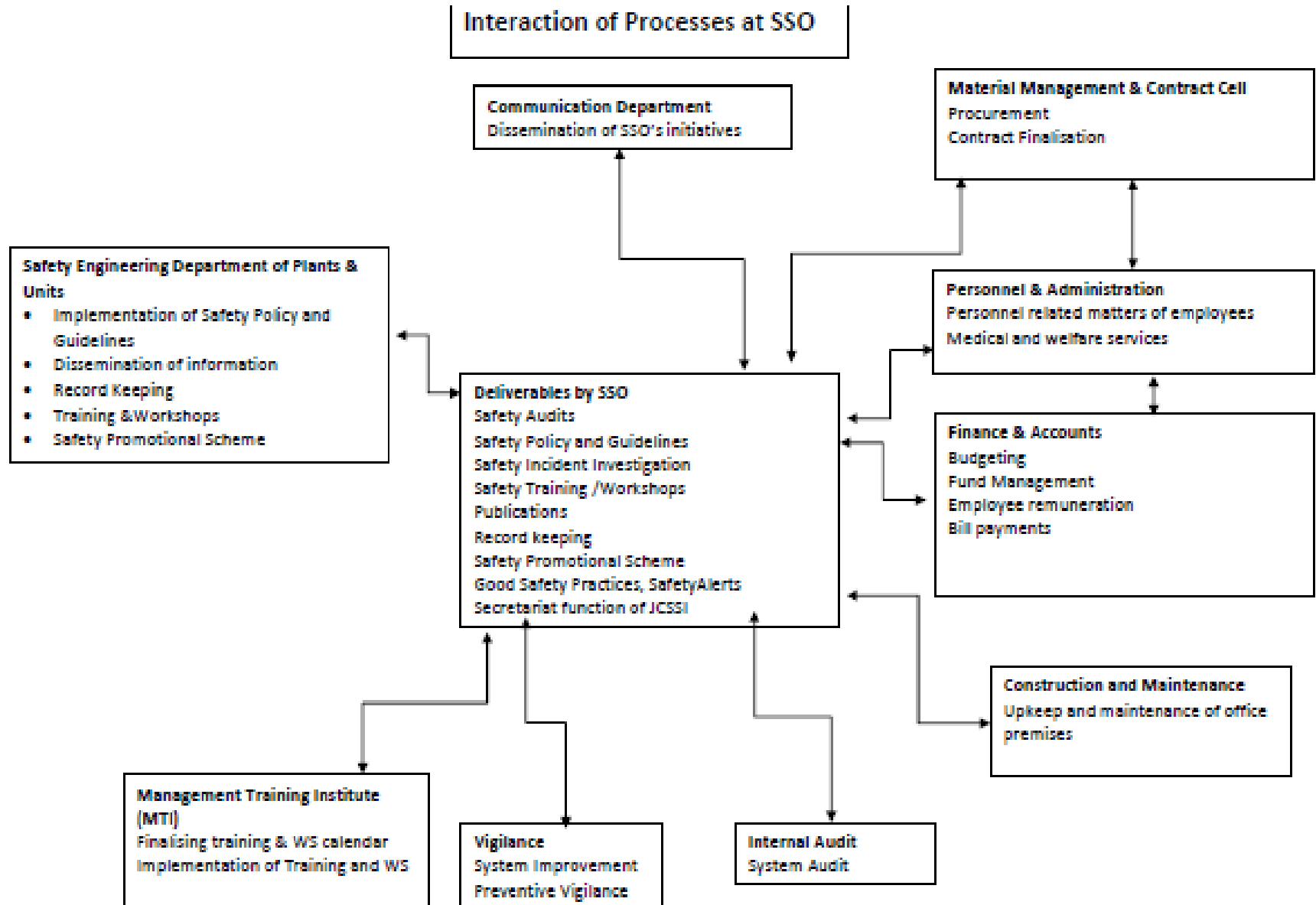


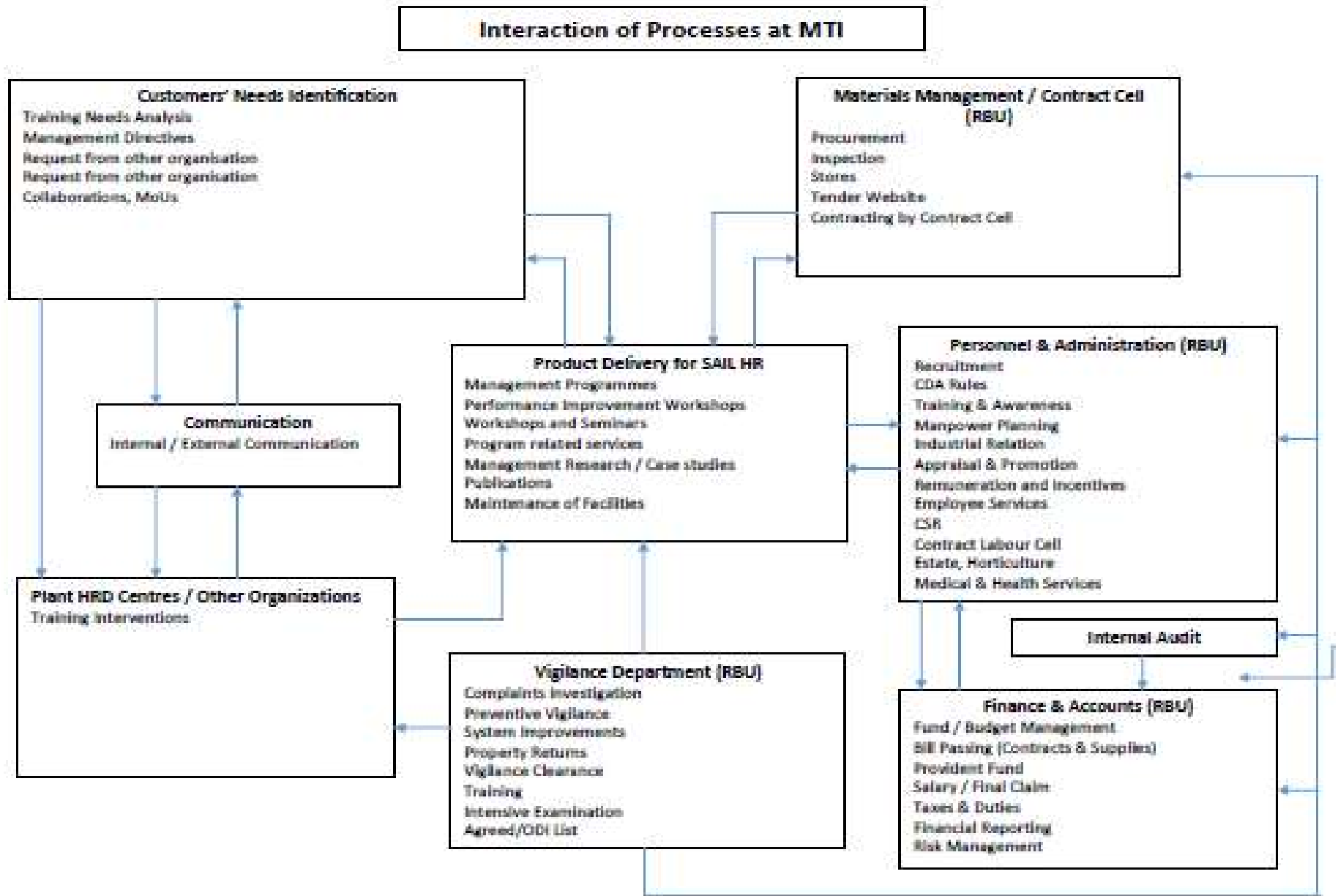




PROCESS INTERACTION DIAGRAM OF CET







PROCESSES	INPUT SOURCE	ACTIVITY/ PROCESS	Environment Management Division (EMD)	Output (PRODUCTS/SERVICES)
Process-I: Data Management	<ul style="list-style-type: none"> Input from Plants & Mines Resources 	<ul style="list-style-type: none"> Data Collection & Compilation Data Analysis Data Presentation 	Environment Management Division (EMD)	<ul style="list-style-type: none"> ED (O) Report Chairman's Report Corporate Environmental report (CER) (Monthly) Quarterly Compliance Report Environmental Concurrence of project proposals Comments on Government Notifications (New or amended)
Process-II: Environmental Studies	<ul style="list-style-type: none"> Input from Plants Mines Clients Resources 	<ul style="list-style-type: none"> Planning/ Scheduling/ Resource/Site Data Analysis & Compilation 		<ul style="list-style-type: none"> Assessment of environmental performance - Plants/Mines (e.g. Tour reports etc.) Input for Environment Clearances and Consents/Authorisations Special Environmental Study Reports
Process-III: Environmental/ legal Interface	<ul style="list-style-type: none"> Outputs from Process I Input from Plants Mines Clients Resources 	<ul style="list-style-type: none"> Liasion & Interaction with Interested Parties Meetings/ Follow up Presentations 		<ul style="list-style-type: none"> Facilitating Services Environmental Clearances(EC) Legal or Other Environmental Compliance Interaction with central agencies Comments on Government Notifications (New or amended)
Process - IV: Corporate Image Building	<ul style="list-style-type: none"> Input from Plants Mines Clients Resources 	<ul style="list-style-type: none"> Presentations Publications Celebrations Participation in Awards Social Media Coverage 		<ul style="list-style-type: none"> Environmental Brochures Technical Papers Environmental Performance Report Corporate Sustainability Report Participation in different Awards like, Green tech, Golden Peacock, Kalinga etc.
Process-V: Training and Awareness Programs	<ul style="list-style-type: none"> Input from Plants Mines Clients Resources 	<ul style="list-style-type: none"> Developing Training Modules/Class Room Sessions Site visits/ Case studies/ Literature review Seminar/Workshops 		<ul style="list-style-type: none"> Training Programs/ modules Practical demonstration/ case study Technology dissemination

Annexure-4

Index of ABMS Documents/ Formats Version 3.0 dated 11.07.2023

S.No.	Doc./Format No.	Title	Version #	Date	Page No.
1	P/ABMS/PR 01/ Ver 2.0	Procedure For ABMS Management	02	11.07.2023	92-95
2	D/ABMS/CM 01/ Ver 2.0	Context Mapping	02	11.07.2023	96-98
3	D/ABMS/N&E 01/ VER 20	Interested Party Need & Expectations Mapping	02	11.07.2023	99-101
4	D/ABMS/OB 01/ Ver 3.0	ABMS Objectives	03	11.07.2023	102-104
5	D/ABMS/RM 01/ Ver 2.0	Risk Assessment Methodology	02	11.07.2023	105-109
6	F/ABMS/RA 01 Ver 2.0	Risk Assessment Format	02	11.07.2023	110-111
7	D/ABMS/SM 01/ Ver 2.0	Skill Matrix	02	11.07.2023	112-113
8	D/ABMS/RR 01/ Ver 3.0	Roles & Responsibilities	03	11.07.2023	114-124
9	F/ABMS/CL 01/ Ver 2.0	Internal Audit Checklist	02	11.07.2023	125-128
10	F/ABMS/IA NC 01 / Ver 2.0	Non Conformities Report	02	11.07.2023	129-130
11	F/ABMS/NCCA 01 / Ver 2.0	Non Conformity Corrective Action Report	02	11.07.2023	131-132
12	F/ABMS/MRM 01/ Ver 2.0	Management Review Meeting	02	11.07.2023	133-135
13	F/ABMS/GF 01/Ver 2.0	Format for Declaration of Gift	02	11.07.2023	136-137

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: 1 Date: 11.07.2023

Document Title: Procedure for ABMS Management
Document No: P/ABMS/PR 01/ Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date 11.07.2023
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Distribution: All employees through SAIL Intranet Portals of the respective Plant and Unit.

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Purpose	:	The purpose of this procedure is to define the Methodology to control key ABMS related issues
Scope	:	The Scope covers requirements of the Standard
Responsibility	:	ABMS Compliance Team
Authority	:	CVO

1.0 Definitions:

Business Associate:

External party with whom there is or there is plan to establish or there is perceived, some form of business relationship. This includes but is not limited to clients, customers, subsidiaries, joint ventures, joint venture partners, consortium partners, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, investors, competitors, employees, contract workmen and Public officials.

Different types of business associate pose different types and degrees of bribery risk, and an organization will have differing degrees of ability to influence different types of business associate. Different types of business associates can be treated differently by the organization's bribery risk assessment and bribery risk management procedures.

Reference to "business" in this document can be interpreted broadly to mean those activities that are relevant to the purposes of the organization's existence.

2.0 Procedure:

Employment Conditions:

As per SAIL CDA Rules for executives & Standing Orders at Plant/Mines for non-executives, wherever , all employees are controlled by Disciplinary guidelines & procedures. In relation to all of its personnel, SAIL has implemented procedures covering conditions of employment & promotion which require personnel to comply with the anti-bribery policy and anti-bribery management system, and give SAIL the right to discipline personnel in the event of non-compliance by personnel. The employees are hired on the condition that they shall comply with policies of the company, which, inter-alia includes anti-bribery policy.

SAIL has established the system which enables it to take appropriate disciplinary action against personnel who violate the anti-bribery policy or anti-bribery management system. Personnel will not suffer retaliation, discrimination or disciplinary action (e.g. by threats, isolation, demotion, preventing advancement, transfer, dismissal, bullying, victimization, or other forms of harassment) for:

- Refusing to participate in, or turning down any activity in respect of which they have reasonably judged there to be a more than low risk of bribery that has not been mitigated by the organization; or
- Concerns raised or reports made in good faith, or on the basis of a reasonable belief, of attempted, actual or suspected bribery or violation of the anti-bribery policy or the anti-bribery management system (except where individual participated in the violation)

In relation to all positions which are exposed to more than a low bribery risk, as determined in the bribery risk assessment and to the anti-bribery compliance function, SAIL has implemented procedures which provide that:

- Due diligence is conducted on persons before they are employed, and on personnel before they are transferred or promoted by SAIL, to ascertain as far as is reasonable that it is appropriate to employ or redeploy them and that is reasonable to believe that they will comply with the anti-bribery policy and anti-bribery management system requirements;
- Performance bonuses, performance targets and other incentivizing elements of remuneration are reviewed periodically to verify that there are reasonable safeguards in place to prevent them from encouraging bribery;

Awareness and Training:

SAIL has established a system to provide adequate and appropriate anti-bribery awareness and training to its personnel in the Plants and Units in which ABMS being implemented. Such trainings shall address issues, as appropriate, taking into account the bribery risk for ensuring that the organization's anti-bribery policy, procedures, anti-bribery management system and their duty to comply. SAIL will also create awareness with its business associates about implementation of ABMS in SAIL Plants and Units through the respective Plant and Unit.

Implementation of Anti-bribery controls:

SAIL has established a system to upload the ABMS Policy (Vision Statement) on the SAIL website and also intimate all employees about the ABMS Policy. SAIL will provide awareness of ABMS and implementation of ABMS in SAIL to its business associates through displays at appropriate places & inserted in relevant documents with a view to encourage them to either implement anti-bribery management system in their organisation or to implement their own anti-bribery controls.

Anti-bribery Commitments

For business associates which pose more than a low bribery risk, SAIL has implemented procedures which require that, as far as practicable:

- a) business associates commit 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) SAIL is able 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 transaction, project, activity, or relationship.

Where it is not practicable to meet the requirements of a) or b) above, this shall be a factor taken into account in evaluating the bribery risk of the relationship with this Interested Party and the way in which the organization manages such risks.

Gifts, hospitality, donations and similar benefits:

“Gifts” means anything of value offered to or received by an individual or members of their family. Gifts include cash and non-cash items, some examples of which are: watches, jewellery, equipment, preferential discounts, loans, favourable terms on a product or service, business or employment opportunities, services, prizes, donations to charities, transportation, use of another company's vehicles, use of vacation facilities, stocks or other securities, participation in stock offerings, home improvements and tickets and gift certificates. SAIL has implemented Gift Policy which is designed to prevent the offering, or acceptance of gifts, hospitality, donations and similar benefits, which could reasonably be perceived as bribery. Acceptance of gifts other than provided in SAIL CDA Rules 1977 is not permissible.

SAIL being a central government CPSE does not give political donations. However, as a responsible corporate citizen, donations to Prime Ministers Relief Fund, any other National/State Relief Funds etc. for various national calamities /disasters etc. may be provided by SAIL as and when such occasions arise.

As part of Corporate Social Responsibility activities, or otherwise, SAIL may support local charities or provide sponsorship, within the scope of corporate social responsibility policy and corporate governance framework of SAIL.

Lodging of an Investigation of Complaints:

Complaints can be lodged by addressing the written communication /letter directly to SAIL Vigilance (CVO/ACVO) on their postal address available on the Vigilance Page on SAIL website, i.e., www.sail.co.in. or through the “Lodge Complaint “ link available on the Vigilance Page of SAIL Website. Complaints will be dealt as per the Complaint Handling Policy of SAIL Vigilance available on the Vigilance Page on SAIL website. In case secrecy of identity is desired, complaints can also be made under PIDPI Resolution, or Vigil Mechanism of SAIL (for SAIL Employees) and the extant procedure for PIDPI/ Vigil Mechanism shall be followed.

Complaints received as above shall be investigated by SAIL Vigilance as per the extant Vigilance Guidelines and Procedures.

Grievance Handling:

For any grievance, following officer may be contacted:

Grievance Officer
Personnel Department
Steel Authority of India Limited
3rd Floor, Ispat Bhawan
Lodhi Road, New Delhi - 110003
Phone - 24300332
E -mail - sail[dot]cpgrams[at]gmail[dot]com

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: 1 Date:11.07.2023

Document Title: Context Mapping
Document No: D/ABMS/CM 01/ Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date. 11.07.2023
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CONTEXT MAPPING FOR ABMS: D/ABMS/CM 01/ Ver 2.0 Dated 11.07.2023

S#	Context	Details	Further Action	Responsibility	Remarks	Target Date
1	STRENGTH	The Governing Body and Top Management of SAIL are committed to ensure 'Anti-Bribery' Management System'	Review at regular intervals to understand status of Compliance & Performance	Governing Body and Top Management	To be reviewed during theMRM	On Calendar Year Basis
2		Vigilance Department of SAIL is ISO 9001 Certified and has well defined systems and Procedures to prevent /address bribery and corruption issues.	Internal Audit to understand status of Compliance & Performance	Vigilance Department & ABMS Compliance Team	To be reviewed during theMRM	-Do-
3		Most of the Plants and Units of SAIL are ISO 9001 Certified for QMS and SAIL has well defined systems and procedures to ensure transparency and fairness in its working including in the areas related to Production, Procurement, Sales, Personnel, Finance etc.	Regular review to understand status of Compliance & Performance	Concerned Department & Compliance Team	To be reviewed during theMRM	-Do-
1	WEAKNESS	Lack of understanding among some employees to ensure effective 'Anti-Bribery Management System'	To improve level of understanding through Awareness / Training	Concerned Department, Vigilance Department & P&A	To be reviewed during the MRM	-Do-
2		Lack of Monitoring of Implementation of Gift Policy	To improve Monitoring	Vigilance Department & concerned Deptts.	To be reviewed during the MRM	-Do-
3		Lack of adequate communication to ensure effective 'Anti-Bribery Management System' across the organization	To improve Communication through Training, Communication, meeting, Displaying Content etc.	Vigilance Department& Concerned Department	To be reviewed during the MRM	-Do-

CONTEXT MAPPING FOR ABMS: D/ABMS/CM 01/ Ver 2.0 Dated 11.07.2023

S#	Context	Details	Further Action	Responsibility	Remarks	Target Date
1	OPPORTUNITY	Once 'Anti-Bribery Management System' is implemented successfully, SAIL can position itself as one of the transparent, fair and clean CPSE in India.	Effective implementation of ABMS with adequate monitoring	ABMS Compliance Team and Vigilance Department	To be reviewed during the MRM	-Do-
2		ABMS will increase the visibility and reputation of the Organisation in front of the society, customers, vendors and potential investors.				-Do-
3		ABMS will improve organisational efficiency and effectiveness in managing risks associated with bribery and the ability to detect fraud.				-Do-
4		ABMS will help in Maximizing financial profit / minimizing financial losses through creation of controls, procedures and processes to mitigate bribery and corruption.				-Do-
1	THREAT	If 'Anti Bribery Management System' is not implemented effectively, then SAIL's interested external parties may not perceive the correct Image of SAIL	Effective implementation of ABMS with adequate monitoring	Vigilance Department & ABMS Compliance Team	To be reviewed during the MRM	-Do-
2		If recognition is not given to efforts of Interested internal parties to curb bribery in form of certification, they may get demotivated to implement the ABMS effectively	Internal Audit to understand status of Compliance & Performance	Vigilance Department	To be reviewed during the MRM	-Do-

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: 1 Date: 11.07.2023

DOCUMENT TITLE: INTERESTED PARTY NEED & EXPECTATIONS MAPPING
DOCUMENT NO: D/ABMS/N&E 01/ VER 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No. 1	Date. 11.07.2023
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Distribution: All employees through SAIL Intranet Portals of the respective Plant and Unit.

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INTERESTED PARTY NEED & EXPECTATIONS MAPPING D/ABMS/N&E 01/ VER 2.0 Dated 11.07.2023

Needs & Expectations of Internal Interested Parties

S#	Interested Party	Needs & Expectation	How to Address	Responsibility
1	Governing Body	Transparent 'Anti-Bribery Management System' ensuring Brand equity of SAIL	As per defined ABMS Policy and Objectives	Top Management of the Plant / Unit
2	Top Management	Effective implementation of 'Anti-Bribery Management System'	As per defined ABMS Policy and Objectives	ABMS Compliance Teams, HODs & All Employees
3	Compliance Team	Effective implementation of 'Anti-Bribery Management System'	As per defined ABMS Policy and Objectives	HODs / Employees
4	Employees	Support and Proper Guidelines from Governing Body / Top Management / Compliance Teams and HODs to effectively implement 'Anti-Bribery Management System'.	1. Following CDA Rules / Standing Orders 2. Following Departmental Guidelines & Procedures 3. Following ABMS procedures	ABMS Compliance Teams / HODs
5	Vigilance Department	(a) Support and Proper Guidelines from Governing Body / Top Management / Compliance Teams (b) Cooperation from all the Employees	1. Following CDA Rules / Standing Orders 2. Following Departmental & Unit's procedures 3. Following ABMS Policy & procedures 4. Following Vigilance Manual	Governing Body / Top Management / ABMS Compliance Teams / HODs / Employees

INTERESTED PARTY NEED & EXPECTATIONS MAPPING D/ABMS/N&E 01/ VER 2.0 Dated 11.07.2023

Needs & Expectations of External Interested Parties

S#	Interested Party	Needs & Expectation	How to Address	Responsibility
1	Government of India	Transparent and effective 'Anti-Bribery Management System'	As per defined Policy of Govt. of India by complying the statutory and legal requirements and ABMS	Governing Body / Top Management
2	State Governments (where SAIL is operating) & PSUs	Transparent and effective 'Anti-Bribery Management System'	As per defined Policies of Govt. of India, State Govt. and by complying with the statutory and legal requirements and ABMS	Governing Body / Top Management
3	CVC/ED/MoS/CBI/Court	Support and Cooperation from SAIL in case of any investigation	As per the requirements of CVC/ED/MoS/CBI/Court	Governing Body / Top Management / Vigilance Dept
4	Customers	Transparent and effective 'Anti-Bribery Management System' to handle Orders	Following laid down GoI Guidelines, SAIL Policies & Procedures and ABMS Enhanced IT interventions	Top Management / HODs/ Employees / Vigilance Dept
5	Suppliers (External Providers)	Transparent Procurement Policy ensuring 'Anti-Bribery Management System'	Following laid down GoI Guidelines, SAIL Policies & Procedures and ABMS, Enhanced IT interventions	Top Management / HODs/ Vigilance Dept / Employees
6	Public	Transparent and effective 'Anti-Bribery Management System'	Following ABMS and Grievance redressal	HODs/Vigilance / Personnel Dept

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: 1 Date: 11.07.2023

Document Title: ABMS Objectives

Document No: D/ABMS/OB 01/ Ver 3.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No. 2	Date. 11.07.2023
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Distribution: Concerned employees of the SAIL Plants and Units through display of ABMS Manual in SAIL Intranet Portals.

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ABMS OBJECTIVES: CALENDAR YEAR BASIS

D/ABMS/OB 01/ VER 3.0 Dated 11.07.2023

S#	Objective	Target	Action Plan	Responsibility	Target Time
1	Bribery Related incidents with External Interested Parties including Supplier/ Customer	Nil	Strict Monitoring	Individual Deptts	On Calendar Year Basis
2	Bribery Related incidents with Internal Interested Parties /Employees	Nil	Strict Monitoring	Individual Deptts	-Do-
3	Reporting of Bribery Related Incidences, if any	100% Compliance	Reporting to Vigilance	Individual Deptts	-Do-
4	To complete Investigation against ABMS Bribery Cases within time limit as per CVC Guidelines	100% lead Time compliance	Strict Review and Monitoring	Vigilance Deptt. of SAIL Plants & Units	-Do-
5	Completion of Disciplinary Proceedings for ABMS cases	As per CVC Guidelines	Strict Review and Monitoring	SAIL Vigilance /Concerned Authorities	-Do-
6	Create awareness Training & Awareness	As per Target given in next page	Strict Monitoring	SAIL Vigilance /Concerned Authorities/ HR of Plants and Units	-Do-
7	Surprise Checks in corruption prone areas	-Do-	Strict Review and Monitoring	Vigilance Deptt of concerned Plants & Units and Corporate Vigilance	-Do-
8	File Scrutiny of high risk area	-Do-	Strict Review and Monitoring	Vigilance Deptt of concerned Plants & Units and Corporate Vigilance	-Do-
9	Intensive Examination of high value project	At least 1 Project in all the Plants and Units except Corporate and EMD	Strict Monitoring	Vigilance Deptt of concerned Plants & Units	-Do-

10	Rotation of Officers posted in Sensitive Areas	100% compliance. Rotation of Officers who have completed 3 years.	Strict Monitoring	<ul style="list-style-type: none"> • Vigilance. • ABMS Compliance Team • Concerned Deptt. • Personnel 	-Do-
11	Finalization of Agreed List of suspected Officers	As per Parameters	Strict Monitoring	Vigilance Deptt of concerned Plants & Units and Corporate Vigilance	-Do-
12	Finalization of Agreed List of Points & Places of Corruption	As per Parameters	Strict Monitoring	Vigilance Deptt of concerned Plants & Units and Corporate Vigilance	-Do-
13	Finalization of List of Officers of Doubtful Integrity	As per Parameters	Strict Monitoring	Vigilance Deptt of concerned Plants & Units and Corporate Vigilance	-Do-
14	Finalization of List of Unscrupulous Suppliers	As per Parameters	Strict Monitoring	Vigilance Deptt of concerned Plants & Units and Corporate Vigilance	-Do-

Targets for each calendar year will be decided with approval of CVO, SAIL. For instance, Annual Targets for 2023 are as under:

	Plant / Unit	Surprise Checks	File Scrutiny	Awareness Program
1.	BSP	275	85	24
2.	BSL	180	120	23
3.	RSP	300	90	23
4.	DSP	235	75	12
5.	ISP	96	36	12
6.	CMO	90	45	30
7.	ASP	72	30	4
8.	SSP	60	12	5
9.	VISL	35	10	4
10.	SRU	24	16	8
11.	CFP	60	36	4
12.	RBU	12	24	4
13.	C.O.	2	2	4
	Total	1441	581	157

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

Document Title: Risk Assessment Methodology

Document No: D/ABMS/RM 01/ Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date.11.07.2023
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RISK ASSESSEMENT METHODOLOGY

D/ABMS/RM 01/ VER 2.0 Dated 11.07.2023

The bribery risk assessment shall be done (a) For high risk Sensitive Deptts. For other low risk Deptts, it shall be done as and when required as per advice of the Governing Body/Top Management/Compliance Team/HODs etc.. (b) During Management Review Meeting (c) In the event of a significant change to the structure or activities of the organization and (d) as and when required as per advice of the Governing Body and Top Management, Customers and Stakeholders etc.. SAIL has developed systems and procedures to identify high risk Deptts./ Areas, Personnel, Suppliers, vendors and points and places of corruption etc. .

List of Sensitive Areas/ Departments and Job rotation: Identification of corruption prone areas in the organization is an important part of preventive vigilance. In a big organisation like SAIL, it is not possible to keep a watch in every nook and corner of Plants and Units. It is, therefore, necessary, that, such areas/departments, where officials mostly come in contact with businessman/ contractors/ suppliers/ parties etc. are identified and watch is kept over them. Corruption prone areas are known as 'sensitive areas' in vigilance parlance. As per the directive of CVC, SAIL has identified such sensitive areas/sensitive posts in the organization and ensures rotation of staff in such posts after three years. Such areas and posts in various Departments / Units are identified by Personnel Deptt with inputs from CVO, and approved by Chairman, SAIL. Officials posted in sensitive positions/posts are rotated after three years to avoid developing vested interests.

In line with the Procedures laid down in the SAIL Vigilance Manual, following Lists are also prepared every year to keep a watch by Vigilance / CBI:

- Agreed List of Suspected Officers in consultation with CBI
- Agreed List of Points and Places of corruption in consultation with CBI
- List of Officers of Doubtful Integrity
- Lists of Unscrupulous Suppliers, Contractors, Clearing Agents etc.

Mitigation of Risks:

- Officers posted in such Sensitive Areas are transferred after 3 years.
- Surprise Check & Inspection of sensitive areas.
- File Scrutiny of corruption prone areas.
- Officers in the Agreed /ODI Lists are not posted in sensitive Department /Areas/Post
- Watch by CBI/SAIL Vigilance of the Officers in Agreed List of Suspected Officers.
- Watch by CBI/SAIL Vigilance on the Agreed List of Points and Places of Corruption.
- Watch by SAIL Vigilance over the officers of Doubtful Integrity.
- Watch by SAIL Vigilance over Unscrupulous Suppliers, Vendors, clearing Agents etc.
- Vigilance clearance - To check the integrity of employees being considered for promotion, confirmation or completion of probation period, conferment of award, settlement of dues on superannuation, etc.
- Submission of Annual Immovable Property Returns

For the purpose of ABMS, list of such High Risk Area in line with Sensitive Areas of SAIL are as under:

List of Sensitive Positions/Areas in SAIL

Sl. No.	Sensitive Positions/Areas
1.	Dispatch Section / Shipping Bays including those of Mines, Weigh Bridges
2.	Marketing Department of Plants
3.	Production Planning, Rake Planning and Sales Coordination of Production Planning and Control (PPC) Department of Plants/Units
4.	Technical Cell (dealing with procurements, contracts, trials) – all Departments of Plants/Units – Works, Non-Works including Refractory Planning Cell and Raw Materials Department
5.	Sections dealing with registration of vendors / trial vendors (Material/Contracts)
6.	Materials Management Departments:- (i) Purchase (ii) Material receipt (Stores) and Inspection
7.	Scrap and Salvage Department / Materials Recovery Department
8.	Contract Cell (Works) and Contract Cell (Non-Works)
9.	Finance:- (i) Bill Passing Section (Contract & Supplies) (ii) PF Section (iii) Final Claim Cell (iv) Fund / Budget Management
10.	Personnel & Administration Department A. Personnel Department (i) Recruitment (ii) Section dealing with appraisals and promotions of executives (iii) Contract Labour Cell (CLC) (iv) Final Settlement Section (v) Corporate Social Responsibility (CSR) B. Town Administration / Services Section (i) Shop and House Allotment Section (ii) Enforcement /Security Department (iii) Horticulture Department (iv) Revenue Section C. L&A / Hospitality Department including guest houses
11.	Coal Import Group of Corporate Office
12.	CMO:- (i) Branches and Stock Yards (ii) Regional Offices (iii) Finance Department (iv) Executive positions upto E-8 grade dealing with International Trade (v) Executive(s) dealing with contracts including stainless steel conversion contract related activities (in Salem) / purchase / registration of vendors as well as bill passing (Finance Department) activities. (vi) Key Accounts Manager (KAM)

13.	Transport & Shipping Department – Chartering of Vessels, Logistics and Finance
14.	Sample preparation & Material /Chemical Testing Section of RCL / RMD of Plants/Units
15.	Public Relations
16.	Project Inspection and Project Commercial (dealing with Tenders, claims, billing and settlement)
17.	Corporate Office, New Delhi (employees dealing with contracts):- (i) Administration (ii) Personnel ITB (Integrated Terminal Benefits) (iii) Law (iv) Corporate Affairs Division (CAD) (v) Sports (vi) C & IT

Note:

- (i) The above list also includes Sectional In-charges of Sensitive Areas/Sections.
- (ii) Tenure based posting of TAs/Officers posted in the office of all EDs/Functional Directors etc. for a period of five (5) years.
- (iii) The executives of C & IT Department dealing with appraisals and promotions of executives are to be rotated on regular basis.

Assessment of Impact/ Severity / consequences of any Risk will be assessed as per the following methodology:

Table A Impact/Consequence/Severity Analysis	
Level	Parameters for Assessment on Impact/Consequence/Severity
Low(1)	Very short term effect. Little damage to business, minor financial cost, least media interest/attention or reputational damage, Minor delay, inconvenience or loss.
Medium(2)	Medium type of impact on Organization's Reputation due to Bribery Issues. Medium term effect with possible media interest / attention or reputational damage.
High(3)	Major/Substantial impact on Organization's Reputation due to Bribery Issues. Very serious Reputational damage, leading to long term effect. Loss of Customer forever, National and international media attention, closure of Operations, Litigation.

Table B Likelihood/Probability Analysis	
Level	Parameters for Assessment on Likelihood/Probability
Low(1)	Probability to occur such incident is almost Nil
Medium(2)	Such kind of incident may happen once in a year
High(3)	Such kind of incident may happen frequently

Assessment Parameter=AxB=C

Table C Actions will be taken based on following	
Score &Category of Severity	Mitigation Plan
1 to 3 -LOW	Activities can be continued with regular monitoring.
4 to 6 -MEDIUM	Activities can be continued with adequate Operational Control and regular monitoring.
7 to 9 -HIGH	Considering high level severity, activities can be continued after mitigation of the risk level. Top Management has to review significant impact and set SMART based Objective/KPI to mitigate the risk level.

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Document Title: Risk Assessment Format

Document No: F/ABMS/RA 01/ Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date 11.07.2023
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S.No.	Activity	ABMS related Risk	Impact on Operation / Business /Organization	(A) Severity Score	(B) Likelihood Score	Total Score Impact Analysis (as per Column A x Column B)	Existing Control	Risk Output	Mitigation
1									

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Document Title: Skill Matrix

Document No: D/ABMS/SM 01/ Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

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CVO, SAIL	
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Revision No.1	Date
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SKILL MATRIX
D/ABMS/SM 01/ Ver 2.0 Dated 11.07.2023

S#	Designation	Skill	Experience	Training
1.	Governing Body Member	Should have excellent Leadership Skill to drive the Organization and Top Management to implement, maintain and continually improve ABMS	Should have knowledge of SAIL's processes including Vigilance process	Awareness of ABMS
2.	Top Management	Should have excellent Leadership Skill to drive all the departments to implement, maintain and continually improve ABMS	Should have knowledge of SAIL's processes including Vigilance process	Awareness of ABMS
3.	Compliance Team	Should have excellent Leadership Skill to oversee the designing of implementation of ABMS	Should have knowledge of SAIL's processes and experience of Vigilance process	Awareness of ABMS processes
4.	Addl. Chief ABMS Officer	Should have good leadership and inter-personal coordination skills to implement ABMS. Should have good communication skill	Should have knowledge of SAIL's processes and experience of Vigilance process.	Training on ABMS processes
5.	Internal Auditor	Should have required skills so that can conduct ABMS Internal Audit	Should have knowledge of SAIL's processes and experience of Vigilance process	Training on ABMS processes
6.	HODs	Should have excellent Leadership Skill to drive the Team Members of the deptt. to implement, maintain and continually improve ABMS	Should have experience as per SAIL's processes	Awareness of ABMS
7.	Front Office Executive	Should be able to understand and implement ABMS. Should have good communication skill	Should have experience as per SAIL's processes	Awareness of ABMS
8.	All Employees	Should be able to understand and implement ABMS.	Should have experience as per SAIL's processes	Awareness of ABMS

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Document Title Roles & Responsibilities

Document No: D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Approved by

CVO, SAIL	
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Revision No. 2.	Date.11.07.2023
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ROLES AND RESPONSIBILITIES OF GOVERNING BODY
D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	The Governing Body Members shall ensure that the organization’s strategy and anti-bribery policy are aligned	SAIL Board is the Governing Body for ABMS. SAIL Board has approved the organization’s Anti-Bribery Policy (Vision Statement) . SAIL Board has authorized Chairman, SAIL or any other person(s) nominated by Chairman, SAIL to take any necessary action to implement ABMS in SAIL Governing Body has full authority to take any action for ABMS.
2.	The Governing Body Members at planned intervals shall receive and review information about the content and operation of the organization’s ABMS from CVO	
3.	The Governing Body Members shall exercise reasonable oversight over the implementation of the organization’s anti-bribery management system by top management and its effectiveness	
4.	The Governing Body shall be responsible for understanding, complying with and applying the anti-bribery management system requirements, as they relate to their role in the organization.	
5.	The Governing Body shall assign one of the members to represent the Governing Body on day to day operations to handle ABMS issues	
6.	The Governing Body shall undertake periodic reviews of the anti-bribery management system based on the information provided by top management and the anti-bribery compliance function and any other information that the governing body requests or obtains.	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

ROLES AND RESPONSIBILITIES OF TOP MANAGEMENT

D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	Ensuring that the anti-bribery management system, including policy and objectives, is established, implemented, maintained and reviewed to adequately address the organization's bribery risks;	The Top Management has full authority to take these actions for ABMS.
2.	Ensuring the integration of the anti-bribery management system requirements into the organization's processes and ensuring that the anti-bribery management system is appropriately designed to achieve its objectives;	
3.	Deploying adequate and appropriate resources for the effective operation of the anti-bribery management system;	
4.	Communicating internally and externally regarding the anti-bribery policy;	
5.	Communicating internally the importance of effective anti-bribery management and of conforming to the anti-bribery management system requirements;	
6.	Ensuring that the anti-bribery management system is appropriately designed to achieve its objectives;	
7.	Directing and supporting personnel to contribute to the effectiveness of the anti- bribery management system;	
8	Promoting an appropriate anti-bribery culture within the organization;	
9	Promoting continual improvement;	
10	Supporting other relevant management roles to demonstrate their leadership in preventing and detecting bribery in their areas of responsibility;	
11	Encouraging the use of reporting procedures for suspected and actual bribery;	
12	Ensuring that no personnel will suffer retaliation, discrimination or disciplinary action for reports made in good faith, or on the basis of a reasonable belief of violation or suspected violation of the organization's anti-bribery policy, or for refusing to engage in bribery, even if such refusal can result in losing business;	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

S#	Responsibility	Authority
13	At planned intervals, reporting to the governing body (SAIL Board) on the content and the operation of the anti-bribery management system and the allegations of serious or systematic bribery.	The Top Management has full authority to take these actions for ABMS.
14	<p>Top Management shall assign to an anti-bribery compliance function (team) , the responsibility and authority for:</p> <p>a) Overseeing the design and implementation by the Organisation of the anti-bribery management system;</p> <p>b) Providing advice and guidance to personnel on the anti-bribery management system and issues relating to bribery;</p> <p>c) Ensuring that the anti-bribery management system conforms to the requirements of ISO 37001:2016;</p> <p>d) Reporting on the performance of the anti-bribery management system to the Governing Body (SAIL Board) and Top Management and other compliance functions as appropriate.</p>	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

ROLES AND RESPONSIBILITIES OF CHAIRMAN
D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	The Chairman, as one of the key top management members, has overall responsibility for the the implementation of, and compliance with, the anti-bribery management system.	Head of the organisation. The Governing Body has authorised Chairman, SAIL or any other person(s) nominated by Chairman, SAIL to take any necessary action to implement ABMS in SAIL.
2.	The Chairman is responsible to ensure that the responsibilities and authorities for relevant roles are assigned and communicated within and throughout every level of organisation.	Chairman, SAIL has authorized CVO, SAIL as the nodal officer for implementation of ABMS.
3.	The Chairman is responsible for understanding, complying with and applying the anti bribery management system requirements, as they relate to their role in the organisation	Having Authority to delegate Responsibility and Authority on ABMS.
4.	The Chairman is responsible to assign personnel /team to an anti bribery management system overseeing the design and implementation by SAIL.	Having Authority to report to Governing Body, the Board and Government of India on ABMS.
5.	The Chairman is responsible to appoint the ABMS coordinator to ensure effective ABMS.	Chairman, SAIL has authorized CVO, SAIL as the nodal officer for implementation of ABMS.
6.	The Chairman is responsible to delegate Responsibility and Authority (time to time) to ensure effective ABMS.	Chairman, SAIL has nominated Top Management for ABMS and Compliance team for ABMS .
8.	The Chairman shall be responsible to ensure provision of required resources to implement ABMS.	Having Authority to delegate Responsibility and Authority on ABMS.
9.	The Chairman shall provide the resource and assign the person(s) who have the appropriate competence, status, authority, and Independence to carry on Compliance function.	Having Authority to delegate Responsibility and Authority on ABMS.

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023:

ROLES AND RESPONSIBILITIES OF CHIEF VIGILANCE OFFICER (CVO)
D D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	The Chief Vigilance Officer (CVO) is part of the Top Management responsible for understanding, complying with and applying the anti-bribery management system requirements, as they relate to their role in the organization.	CVO has been nominated as the nodal officer for implementation of ABMS in SAIL.
2	CVO shall approve the ABMS Manual and subsequent Amendments thereof.	Has been authorized by Chairman, SAIL for the same,
3	CVO shall nominate the Management Representative for ABMS	Has been authorized by Chairman, SAIL for the same,
4.	CVO shall guide the Vigilance/Compliance Team to establish, implement, maintain and continually improve ABMS in the CO and BSL.	CVO is authorized to take decision against any kind of ABMS Non Conformance
5	CVO shall evaluate the performance, effectiveness & efficiency of the ABMS and submit a yearly Report on ABMS to the SAIL Board / Top Management.	Has been authorized by Chairman, SAIL for the same
6	CVO shall chair the Management Review Meeting	Having authority for the same.
7.	CVO shall maintain all the ABMS related protocol.	Having Authority to delegate Responsibility and Authority to ACVO/HOD Corporate Vigilance

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

ROLES AND RESPONSIBILITIES OF COMPLIANCE TEAM
D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	The Compliance Team shall oversee the design and implementation of the anti-bribery management system;	Full for ABMS
2.	The Compliance Team shall provide advice and guidance to personnel on the anti-bribery management system and issues relating to bribery;	
3.	The Compliance Team shall ensure that the anti-bribery management system conforms to the requirements of ISO 37001:2016.	
4.	The Compliance Team shall ensure that compliance function shall assess on a continual basis whether the anti-bribery management system is: (a) adequate to manage effectively the bribery risks faced by the organization; (b) being effectively implemented.	
5.	Once a year, the Compliance Teams shall report on the adequacy and implementation of the ABMS and audits conducted for ABMS; to their Top Management for ABMS. Compliance Teams also shall suggest changes, if any, required in the Systems and Procedures for ABMS. The ABMS Review Reports of the Top Management for ABMS of each Plant /Unit shall be forwarded to CVO, SAIL for submitting a consolidated Report to the SAIL Board for governing body review of ABMS.	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

**ROLES AND RESPONSIBILITIES OF ADDL. CHIEF ABMS OFFICER OF SAIL PLANTS & UNITS
D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023**

S#	Responsibility	Authority
1.	The ACVOs of the SAIL Plants and Units and CGM (Vig)/HOD of Corporate Vigilance, are designated as the Addl. Chief ABMS Officer for their respective Plant and Unit. They are ex-officio members of the Compliance Team, as such, they shall have all the responsibilities of a Compliance Team member.	Full for ABMS as Compliance Team Member. As per delegation of Power for other jobs.
2.	The Addl. Chief ABMS Officer shall coordinate the activities with other Deptts of their Plant and Unit for implementation and maintenance of ABMS.	
3.	The Addl. Chief ABMS Officer shall be responsible to organize Internal Audit for ABMS, review meetings of the Compliance Team and Top Management of their Plant and Unit.	
4	The Addl. Chief ABMS Officer shall be responsible to coordinate with the certification agency for external audit and certification for ABMS.	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: Date:

**ROLES AND RESPONSIBILITIES OF HODs (INCLUDING HODS OF HR, FINANCE, MM, MARKETING, VIGILANCE)
D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023**

S#	Responsibility	Authority
1.	The HOD shall be responsible for understanding, complying with and applying the anti-bribery management system requirements, as they relate to their role in the organization.	NIL for ABMS. As per delegation of Power for other jobs.
2.	The HOD shall be responsible not to take or give any bribe to anyone	
3.	The HOD shall be responsible to monitor the activities of the internal and external people to ensure effective implementation of the ABMS in his Deptt.	
4.	The HOD shall be responsible to report to the Vigilance Team as soon as any ABMS related non conformance is identified.	
5.	The HOD shall coordinate for ABMS Document control, Audit (Internal and External), Review Meetings in the department.	
6.	The HOD shall coordinate with all the sections of his department to implement ABMS.	
7.	The HOD shall ensure achievement of ABMS related targets in the Department.	
8.	The HOD shall suggest to the Compliance Team, changes, if any, required in the Systems and Procedures for ABMS as far as his Deptt is concerned.	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

ROLES AND RESPONSIBILITIES OF SECURITY

D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	The Security Team shall be responsible for understanding, complying with and applying the anti-bribery management system requirements, as they relate to their role in the organization and shall be responsible not to take or give any bribe to anyone.	NIL for ABMS. As per delegation of Power for other jobs.
2.	The Security Team shall be responsible for communicating ABMS related policy to the Visitors	
3.	The Security Team shall be responsible to monitor the activities of the Visitors and Staffs to ensure effective implementation of the ABMS	
4.	The Security Team shall be responsible to report to the Vigilance Team as soon as any ABMS related non conformance is identified.	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by , CVO, SAIL	Revision No:2 Date: 11.07.2023

ROLES AND RESPONSIBILITIES OF ALL EMPLOYEES

D/ABMS/RR 01/ Ver 3.0 Dated 11.07.2023

S#	Responsibility	Authority
1.	All the employees of the SAIL Plant and Unit shall be responsible for understanding, complying with and applying the anti-bribery management system requirements, as they relate to their role in the organization.	NIL for ABMS. As per delegation of Power for other jobs.
2.	All the employees of the SAIL Plant and Unit shall be responsible not to take or give any bribe to anyone.	
3.	All the employees of the SAIL Plant and Unit shall be responsible to monitor the activities of the internal and external people to ensure effective implementation of the ABMS in their Plant /Unit.	
4.	All the employees of the SAIL Plant and Unit shall be responsible to report to the Vigilance Deptt. of their Plant and Unit, as soon as any ABMS related non conformance is identified.	

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:2 Date: 11.07.2023

Document Title: Internal Audit Checklist

Format No: F/ABMS/CL 01/ Ver 2.0 Dated 11.07.2023

Prepared By

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Reviewed by

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Approved by

CVO, SAIL	
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**Internal Audit Checklist for Anti-Bribery Management System (ISO 37001:2016)
Format No. F/ABMS/CL 01/ Ver 2.0 Dated 11.07.2023**

S#	Requirement with Clause No.	Evidence
A4. Context of the Organization		
	4.1 Understanding of the Organization and its context	Context Mapping D/ABMS/CM01/Ver 2.0
	4.2 Understanding the needs and expectations of stake holders	Needs and expectations D/ABMS/N&E 01/Ver 2.0
	4.3 Determining the scope of the anti-bribery management system	Scope statement in ABMS Manual
	4.4 Anti-bribery management system	List of Process and their interface in Annexure-3
	4.5 Bribery risk assessment	ABMS Risk methodology D/ABMS/RM01/Ver 2.0 ABMS Risk Assessment Format F/ABMS/RA 01/Ver 1.0
B5. Leadership		
	5.1 Leadership and commitment	Minutes of Meetings
	5.1.1 Governing body	Governing body details
	5.1.2 Top Management	Top management details
	5.2 Anti-bribery policy	ABMS Policy communicated or not (Display)
	5.3 Organizational roles, responsibilities and authorities	Organizational Chart as per Annexure-2
	5.3.1 Roles and responsibilities	D/ABMS/RR 01/Ver 3.0
	5.3.2 Anti-bribery compliance function	Compliance Committee Meetings
	5.3.3 Delegated decision - making	Whether following DOP

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Internal Audit Checklist for Anti Bribery Management System (ISO 37001:2016)

Format No. F/ABMS/CL 01/ Ver 2.0 Dated 11.07.2023

S#	Requirement with Clause No.	Evidence
C6. Planning		
	6.1 Actions to address risks and opportunities	ABMS Risk methodology D/ABMS/RM01/Ver 2.0 ABMS Risk Assessment Format F/ABMS/RA 01/Ver 1.0
	6.2 Anti-bribery objectives and planning to achieve them	ABMS Objectives D/ABMS/OB 01/Ver 3.0
D7. Support		
	7.1 Resources	Resource planning/MRM meeting
	7.2 Competence & Employment process	Skill Matrix D/ABMS/SM 01/Ver 2.0
	7.3 Awareness and training	Training Records
	7.4 Communication	Flow Communication as mentioned in Manual
	7.5 Documented Information	List of Documents, List of Formats, List of External Docs
E8. Operations		
	8.1 Operational planning and control	Process mapping and Risk Assessment
	8.2 Due diligence	Whether following CDA Rules / Standing Orders, Departmental & ABMS procedures
	8.3 Financial Controls	DOP and Budget estimate

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Internal Audit Checklist for Anti-Bribery Management System (ISO 37001:2016)

Format No. F/ABMS/CL 01/ Ver 2.0 Dated 11.07.2023

S#	Requirement with Clause No.	Evidence
	8.4 Non-financial controls	DOP, CDA /Standing orders, Departmental Proceedings and Vigilance Manual
	8.5 Implementation of anti-bribery controls by controlled organizations and by the business associates/Interested parties	Whether following all clauses as per agreements
	8.6 Anti-bribery commitments	ABMS policy & Vigilance Manual
	8.7 Gifts, hospitality, donations and similar benefits	CDA Rules & ABMS Manual
	8.8 Managing inadequacy of anti-bribery controls	Review Meetings
	8.9 Raising concerns	Lodging of Complaints / Grievance redressal
	8.10 Investigating and dealing with bribery	Preventive check and Investigation Manual
F9. Performance Evaluation		
	9.1 Monitoring measurement, analysis and evaluation	
	9.2 Internal Audit	Performance analysis
	9.3 Management review	As per Manual
	9.3.1 Top Management review	Top Management MOM
	9.3 Governing Body review	BOD MOM related to ABMS
	9.4 Review by anti-bribery compliance Function	Minutes of Compliance Team Meetings
G10. Improvements		
	10.1 Non conformity and corrective action	NC & CA
	10.2 Continual improvement	Objectives and Data Analysis

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date:11.07.2023

Document Title: NC Report

Format No: F/ABMS/IA NC 01 / Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date.11.07.2023
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Distribution: All employees through SAIL Intranet Portals of the respective Plant and Unit.

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NC REPORT
Format No. F/ABMS/IA NC 01 / Ver 2.0 Dated 11.07.2023

Format for recording Non Conformities/Observations		Ref:.....
Unit/Dept. Audited:	Activity/Process audited	NC/Observation No.
Name of Auditee (s):	Name of Auditor	System Audited: Audit Date:
Details of findings with objective evidence. What was observed?		
Date:		Sign of Auditor
Documented Information/Reference	Departmental Manual	
Standard: I		
Clause Reference I		
Immediate correction done		
Root Cause Analysis (Identify Causes}		
Corrective action taken to solve the cause of non conformity (To stop recurrence of the cause)		
Date:		Signature of Auditee

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Document Title: Non Conformity Corrective Action Report

Format No: F/ABMS/NCCA 01 / Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date.11.07.2023
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NON CONFORMITY CORRECTIVE ACTION REPORT
Format No. F/ABMS/NCCA 01 / Ver 2.0 Dated 11.07.2023

Non-conforming Report No:		Date:	
Source:		Reference/ Procedure:	
Particulars of NC			
Operational Area			
Immediate Correction Done			
Review or investigate the Incident and determine the cause of NC			
Corrective action taken to stop the recurrence of the NC			
Whether similar incidents have occurred or may occur in the organization or have potential to occur? if, yes, please specify			
Review the effectiveness of the corrective action			
Is any charge required in ABMS system including updating Risk and Opportunity			
Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Document Title: Management Review Meeting

Format No: F/ABMS/MRM 01 / Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date.11.07.2023
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MANAGEMENT REVIEW MEETING
Format No. F/ABMS/MRM 01 / Ver 2.0 Dated 11.07.2023

Topic of the Meeting	Management Review Meeting on ABMS
Date of Meeting	
Meeting Chaired By	
Participants of the Meeting	

- 1) The status of actions from previous management reviews.
- 2) Changes in external and internal issues relevant to ABMS
 - Details of Discussion:
 - Conclusion
 - Target Date
 - Responsibility
- 3) Information on the performance of the anti-bribery management system, including trends in:
 - A. Non conformities and corrective action
 - (i) NC during on-job review -
 - (ii) NC during Compliance Audit -
 - (iii) NC during ABMS Internal Audit -
 - (iv) NC during ABMS External Audit -

Details of Discussion:

Conclusion

Target Date

Responsibility
 - B. Monitoring and Measurement results:
 - Details of Discussion:
 - Conclusion
 - Target Date
 - Responsibility
 - C. Audit Results
 - (i) ABMS Internal Audit -
 - (ii) ABMS External Audit -
 - (iii) ABMS Compliance Audit -

- Details of Discussion:
- Conclusion
- Target Date
- Responsibility

D. Reports of Bribery

- Details of Discussion:
- Conclusion
- Target Date
- Responsibility

E. Investigations:

- Details of Discussion:
- Conclusion
- Target Date
- Responsibility

F. Nature of Extent of Bribery risk faced by organization

- Details of Discussion:
- Conclusion
- Target Date
- Responsibility

G. Effectiveness of actions taken to address bribery risks:

- Details of Discussion:
- Conclusion
- Target Date
- Responsibility

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No: 1 Date: 11.07.2023

Document Title: Format for Declaration of Gift
Format No: No. F/ABMS/GF/ 01/ Ver 2.0 Dated 11.07.2023

Prepared By

GM (Vig)	
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Reviewed by

CGM (Vig)	
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Approved by

CVO, SAIL	
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Revision No.1	Date.11.07.2023
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Format for Declaration of Gift
Format No: No. F/ABMS/GF/ 01/ Ver 2.0 Date. 11.07.2023
(Reference Clause 12 (1) of SAIL CDA Rules, 1977)

Sr. No.	Date of Receipt of Gift	Brief Details of Gift	Gift given by	Approximate value	Whether having any Business relationship with the Giver of the gift	Remarks, if any

(Signature)
Name
Designation
P. No.

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No:1 Date: 11.07.2023

Annexure-5

Documents Referred to in the ABMS Manual (Ver. 3.0 Dated 11.07.2023)

S No.	Document	Custody	Documents Type
1	SAIL Personnel Manual	SAIL Corporate Personnel	Internal
2	SAIL CDA Rules 1977	-do-	Internal
3	Sensitive Areas List	-do-	Internal
4	Standing Orders	SAIL Plants /Units	Internal
5	Purchase & Contract Procedure 2020	CMMG	Internal
6	SAIL Policy for Import of Coal and Coke	CIG	Internal
7	Standard Bidding Documents for Turnkey Projects	Projects Directorate	Internal
8	Integrity Pact	-do-	Internal
9	SAIL General Tender Terms (SAIL P1)	CMMG/BSL MM	Internal
10	Procedure for Banning of Business Dealings with Suppliers	CMMG	Internal
11	CVC Vigilance Manual	CVC	External
12	Whistle Blower policy /PIDPI Resolution	CVC	External
13	SAIL Vigilance Manual	Corporate Vigilance	Internal
14	QMS Manual & Procedures for SAIL Vigilance	-do-	Internal
15	Complaint Handling Policy of SAIL	-do-	Internal
16	Annual immovable property Returns Files	-do	Internal
17	Agreed List of Suspected Officers @	-do-	Internal
18	Agreed List of points & Places of Corruption @	-do-	Internal
19	List of Officers of Doubtful Integrity @	-do-	Internal
20	List of Unscrupulous Suppliers, Contractors, Clearing Agents etc. @	-do-	Internal
21	Vigilance Clearance Policy	-do-	Internal
22	Vigil Mechanism	Corporate Personnel	Internal

@Confidential Documents - Only for use by Vigilance Deptt

Prepared by GM (Vig)	Reviewed by CGM (Vig)	Approved by CVO, SAIL	Revision No.2 Date: 11.07.2023



Anti-Bribery Management Policy (Vision Statement) of SAIL

SAIL is committed to be a respected world class corporation and the leader in Indian steel business in quality, productivity, profitability, customer satisfaction, and will carry out all its activities in a manner that ensures effective Anti- Bribery Management System in the organisation.

SAIL is committed to achieve continual improvement of its 'Anti-Bribery Management System (ABMS)' through:

- ✓ *Identification of Contexts, Risks & Opportunities on Anti-Bribery in the organization*
- ✓ *Identification of needs & expectations of internal & external interested parties*
- ✓ *Compliance with applicable Anti-Bribery Laws*
- ✓ *Establishing a Management System which prohibits bribery in the organisation while complying with all applicable legal requirements*
- ✓ *Establishing a Management System that encourages raising concerns in good faith or on the basis of a reasonable belief in confidence, without fear of reprisal*
- ✓ *Establishing a Management System explaining the authority and independence of the Anti-Bribery Compliance Function*
- ✓ *Establishing a Management System explaining the consequences of not complying with the Anti-Bribery Policy.*
- ✓ *Establishing a System for setting, reviewing and achieving Anti-Bribery Objectives.*
- ✓ *Involvement of and contribution from all Interested Parties (e.g. employees, stakeholders and business associates)*

SAIL is also committed to review the effectiveness of this Policy periodically.

*(Soma Mondal)
Chairman*

Date: 08.04.2022

Steel Authority of India Limited



सेल की रिश्वत रोधी प्रबंधन नीति (लक्ष्य कथन)

सेल एक सम्मानित विश्व स्तरीय कॉर्पोरेशन बनने और साथ ही, भारतीय इस्पात व्यापार में भी गुणवत्ता, उत्पादकता, लाभप्रदता और ग्राहक संतुष्टि की दृष्टि से अग्रणी बनने के लिए प्रतिबद्ध है और वह अपनी सभी गतिविधियों को इस प्रकार संपन्न करेगा कि संगठन में एक प्रभावी रिश्वत रोधी प्रबंधन तंत्र सुनिश्चित हो सके।

सेल अपने 'रिश्वत रोधी प्रबंधन तंत्र (ए बी एम एस)' को निम्नलिखित उपायों द्वारा निरंतर बेहतर बनाते रहने के लिए प्रतिबद्ध है :

- ✓ संगठन में रिश्वत रोधी संदर्भों, जोखिमों और अवसरों की पहचान करके।
- ✓ आंतरिक और बाहरी इच्छुक पक्षों की ज़रूरतों और अपेक्षाओं की पहचान करके।
- ✓ प्रयोज्य रिश्वत रोधी कानूनों का अनुपालन करके।
- ✓ एक ऐसा प्रबंधन तंत्र स्थापित करके जो प्रयोज्य सभी कानूनी आवश्यकताओं का अनुपालन करते हुए संगठन में रिश्वत का निषेध करता हो।
- ✓ एक ऐसा प्रबंधन तंत्र स्थापित करके जो बदले की कार्रवाई के डर के बिना, सद्भावनापूर्ण तरीके से या तर्कसंगत विश्वास के आधार पर तत्संबंधी सरोकार उठाने को प्रोत्साहित करता हो।
- ✓ एक ऐसा प्रबंधन तंत्र स्थापित करके जो रिश्वत रोधी अनुपालन कार्य के प्राधिकार और स्वतंत्रता को स्पष्ट करता हो।
- ✓ एक ऐसा प्रबंधन तंत्र स्थापित करके जो रिश्वत रोधी नीति का अनुपालन न करने के नतीजों को स्पष्ट करता हो।
- ✓ रिश्वत रोधी लक्ष्यों को निर्धारित करने, उनकी समीक्षा करने और उन्हें प्राप्त करने के लिए एक तंत्र की स्थापना करके।
- ✓ सभी इच्छुक पक्षों (जैसे, कार्मिकों, शेयरधारकों और व्यापार सहयोगियों) की भागीदारी और योगदान द्वारा।

सेल समय-समय पर इस नीति की प्रभावकारिता की समीक्षा करने के लिए भी प्रतिबद्ध है।

(सोमा मण्डल)

अध्यक्ष

दिनांक : 08.04.2022

स्टील अथॉरिटी ऑफ इण्डिया लिमिटेड