


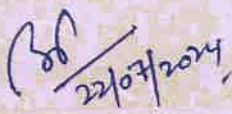
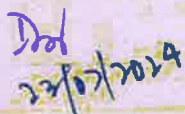



ANTI-BRIBERY MANAGEMENT SYSTEM MANUAL

SJVN LIMITED

SHAKTI SADAN, SHANAN,

SHIMLA, HIMACHAL PRADESH-171006, INDIA

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SECTION 1.0

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1.1 REVISION HISTORY

Table with 6 columns: Sr. No., Description, Page No, Current Issue No., Current Revision No., Effective Date. It details the revision history of the Anti-Bribery Management System Manual, including initial issues and subsequent updates.



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**SECTION 2.0
INTRODUCTION**

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2.1 Introduction: about SJVN

SJVN Limited, a Mini Ratna Category-I and Schedule – ‘A’ CPSE under the administrative control of the Ministry of Power, Govt. of India, was incorporated on May 24, 1988, under the Companies Act, 1956 as a joint venture of the Government of India (GOI) and the Government of Himachal Pradesh (GOHP). SJVN is now a listed Company having a shareholding pattern of 59.92 % with Govt. of India, 26.85 % with Govt. of Himachal Pradesh, and the rest 13.23 % with the public. The vision of the company states, “To be the best-in-class Indian power company, globally admired for developing affordable clean power and sustainable value to all stakeholders”. The present paid-up capital and authorized capital of SJVN are Rs. 3,929.80 Crore and Rs. 7,000 Crore respectively.

SJVN is committed to generating reliable and eco-friendly power using state-of-the-art technology, excellence in engineering, and continual improvement in quality management. SJVN as a responsible corporate entity has established sound business, financial and regulatory policies ever since it came into existence.

2.2 Introduction: about Anti-Bribery Management System (ABMS)

SJVN aims to be successful in the long term and needs to establish and maintain a culture of compliance, considering the needs and expectations of interested parties. ABMS, as per ISO 37001:2016 is therefore not only the basis, but also an opportunity, for a successful and sustainable organization.

ABMS is an ongoing process and the outcome of it ensures that SJVN is meeting its obligations. ABMS is made sustainable by embedding it in the culture of the organization and the behaviour and attitude of people working for it.

An effective, organization-wide ABMS will enable SJVN to demonstrate its commitment to comply with relevant laws, regulatory requirements, industry codes, and organizational



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standards, as well as standards of good governance, generally accepted best practices, ethics, and community expectations.

SJVN's approach to compliance is shaped by the leadership applying core values and generally accepted good governance, ethical and community standards. Embedding ABMS in the behaviour of the people working for an organization depends above all on leadership at all levels and clear values of an organization, as well as an acknowledgment and implementation of measures to promote compliant behaviour and to avoid the risk of noncompliance.

SJVN is increasingly convinced that, by applying binding values and appropriate ABMS, it can safeguard its integrity and avoid or minimize noncompliance with the organization's compliance obligations. Integrity and effective compliance are therefore key elements of good and diligent management. ABMS also contributes to the socially responsible behaviour of organizations.

One of the objectives of this Manual is to assist SJVN to develop and spread a positive culture of ABMS, considering that an effective and sound management of ABMS-related risks should be regarded as an opportunity to pursue and take, due to the several benefits that it provides.

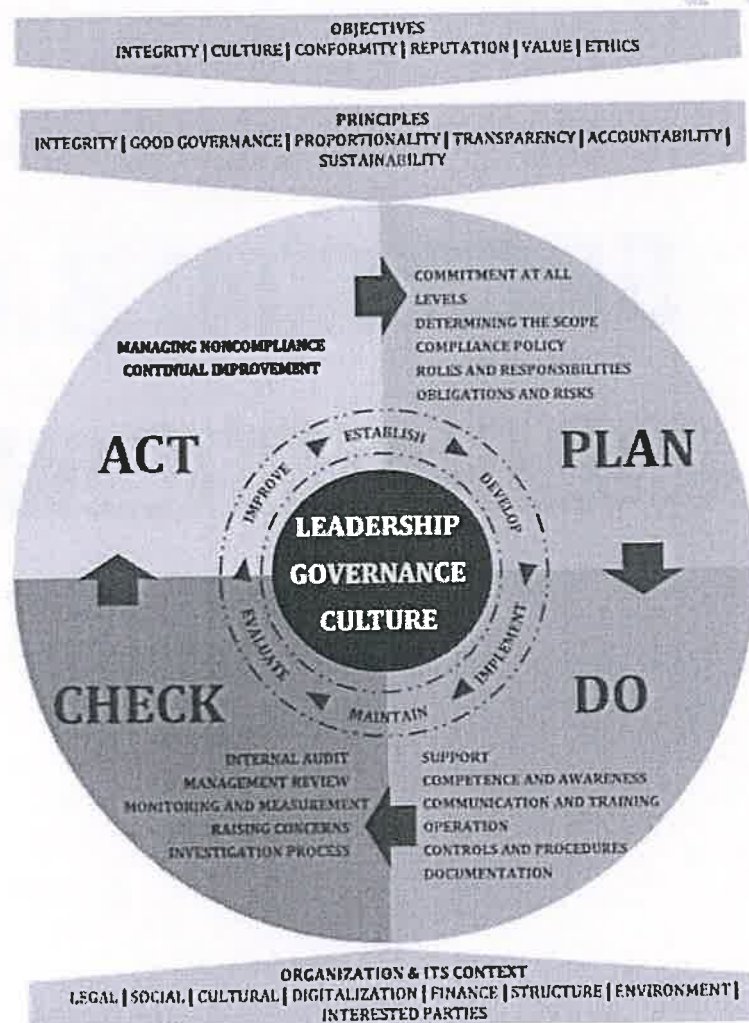
Some of the benefits SJVN believes because of the implementation of ABMS may be:

- Improving business opportunities and sustainability.
- Protecting and enhancing SJVN's reputation and credibility.
- Considering the expectations of interested parties.
- Demonstrating SJVN's commitment to managing its compliance risks effectively and efficiently.
- Increasing the confidence of third parties in the SJVN's capacity to achieve sustained success.
- Minimizing the risk of a contravention occurring with the attendant costs and reputational damage.



The ABMS Manual provides interpretations/guidance on ABMS and recommended practices, in meeting the requirements of ISO 37001:2016. Both interpretations and the guidance in this Manual are intended to be adaptable for implementation.

While implementing ABMS, SJVN will be following the model proposed by ISO 37001:2016





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**SECTION 3.0
DEFINITIONS**

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3.1 Definitions

1. **Organization:** a person or group of people that has its functions with responsibilities, authorities, and relationships to achieve its objectives.
2. **Interested party (preferred term)/stakeholder (admitted term):** person or organization that can affect, be affected by, or perceive it self to be affected by a decision or activity.
3. **Top management:** a person or group of people who directs and controls an organization at the highest level.
4. **Management system:** a set of interrelated or interacting elements of an organization to establish policies, and objectives as well as processes to achieve those objectives.
5. **Policy:** intentions and direction of an organization, as formally expressed by its top management.
6. **Objective:** result to be achieved.
7. **Risk:** effect of uncertainty on objectives.
8. **Process:** a set of interrelated or interacting activities that use or transform inputs to deliver a result.
9. **Competence:** ability to apply knowledge and skills to achieve intended results.
10. **Documented information:** information required to be controlled and maintained by an organization, and the medium on which it is contained.
11. **Performance:** measurable result.
12. **Continual improvement:** recurring activity to enhance performance.
13. **Effectiveness:** the extent to which planned activities are realized and planned results are achieved.
14. **Requirement:** need or expectation that is stated, generally implied, or obligatory.
15. **Conformity:** fulfilment of a requirement.
16. **Nonconformity:** non-fulfilment of a requirement.
17. **Corrective action:** action to eliminate the cause(s) of non-conformity, and to prevent recurrence.



18. **Audit:** systematic and independent process for obtaining evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
19. **Measurement:** process to determine a value.
20. **Monitoring:** determining the status of a system, a process, or an activity.
21. **Governing body:** person or group of persons that has the ultimate responsibility and authority for an organization's activities, governance, and policies, and to which top management reports and by which top management is held accountable.
22. **Personnel:** individuals in a relationship recognized as a work relationship in national law or practice, or in any contractual relationship that depends on its activity from the organization.
23. **Compliance function:** a person or group of persons with responsibility and authority for the operation of the compliance management system.
24. **Compliance risk:** the likelihood of occurrence and the consequences of noncompliance with the organization's compliance obligations.
25. **Compliance obligations:** requirements that an organization mandatorily has to comply with as well as those that an organization voluntarily chooses to comply with.
26. **Compliance:** meeting all the organization's compliance obligations
27. **Noncompliance:** non-fulfilment of compliance obligations.
28. **Compliance culture:** values, ethics, beliefs, and conduct that exist throughout an organization, and interact with the organization's structures and control systems to produce behavioural norms that are conducive to compliance.
29. **Conduct:** behaviours and practices that impact outcomes for customers, employees, suppliers, markets, and communities.
30. **Third party:** person or body that is independent of the organization.
31. **Procedure:** the specified way to carry out an activity or a process.



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**SECTION 4.0
CONTEXT, SCOPE &
CONTROL OF
ABMS MANUAL**

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4.0 CONTEXT, SCOPE & CONTROL OF ABMS MANUAL

4.1 Purpose

This 'ANTI-BRIBERY MANAGEMENT SYSTEM Manual' has been evolved for formulating the organization, responsibilities, & policies of **SJVN LIMITED** for implementing an ANTI-BRIBERY MANAGEMENT SYSTEM (ABMS) to meet the content & purpose of the company's ABMS Policy, objectives and for providing direction with discipline to all members of the organization for the same.

4.2 Context of the Organization

i) External and Internal issues

The organization determines external and internal issues that are relevant to its purpose and its strategic direction and that affect its ability to achieve the intended results of its ABMS Management System. The organization monitors and reviews information about these external and internal issues through periodical feedback and internal audit of different processes.

Internal Issues Specific to ABMS:

- a) Handling of single bidder
- b) CSR activities
- c) Financial Controls
- d) Handling of bogus firms
- e) Verification process of bidder documentation
- f) Approvals for letting the contractor sublet a portion of the contract.
- g) Rejection of bidder
- h) Investigation of facts
- i) Corruption (bribery)-related practices
- j) Irregularities in bidding through the GeM portal
- k) Handling of ambiguous complaints
- l) Awareness of ABMS
- m) Recruitment process
- n) Financial evaluation at the Tendering stage



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External Issues Specific to ABMS:

- a) Awareness of the bidders related to various laid down procedures of GFR and SJVN's Procurement & Work Policy
- b) Creating awareness of business associates for ABMS, and the consequences of not following it.
- c) Handling of complaints from Ministries

ii) Interested parties and their Needs & Expectations/Requirements:

The organization determines & reviews once a year in Management Review Committee meeting, the need and expectations/ Requirements of interested parties such as:

S. No	Interested Parties	Needs and Expectations/Requirements
1	Employees	Awareness of ABMS, and consequences of not following it.
2	Ministries of Central & State Govt.	Handling of complaints as per CVC Manual
3	Governing Body.	Zero tolerance on corruption, and implementation of all applicable Indian laws related to Corrupt Practices
4	Customers.	Image Building, less litigation, and more business.
5	Business Associates (Suppliers/Vendors/Financiers/Consultant/Sub-contractors, etc.)	Freedom of raising concern

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4.3 Scope

The boundary for ABMS Implementation: Corporate offices and 12 Sites:

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1.	Corporate Head Quarters, Shimla	Himachal Pradesh
2.	Corporate Office, New Delhi	Delhi
3.	NathpaJhakri HPS	Himachal Pradesh
4.	Rampur HPS	Himachal Pradesh
5.	Luhri -1 HEP	Himachal Pradesh
6.	Sunni HEP	Himachal Pradesh
7.	LHEP stage -II	Himachal Pradesh
8.	DhauLasidh HEP	Himachal Pradesh
9.	Devsari HEP	Uttarakhand
10.	Naitwar Mori	Uttarakhand
11.	Jakholsankri	Uttarakhand
12.	Khirvire Wind Powerstation	Maharashtra
13.	Sadla Wind Power station	Gujrat
14.	Charanka Solar Power Station	Gujrat

This includes the ABMS management system requirements as per ISO 37001:2016 for the following activities:

“Provisioning for Electricity Generation, Transmission & Trading and associated related activities for Hydro Power, Solar Power & Wind Power.”

The possible Legal requirements applicable for the above scope for ABMS will:

- Bharatiya Nyaya Sanhita (BNS) – 2023.
- Prevention of Corruption Act, 1988 r/w Amendments of 2018
- Contract Act, 1872 (with special reference to public procurement)
- Competition Act, 2000
- Companies Act, 2013
- Whistle-blower Protection Act, 2014

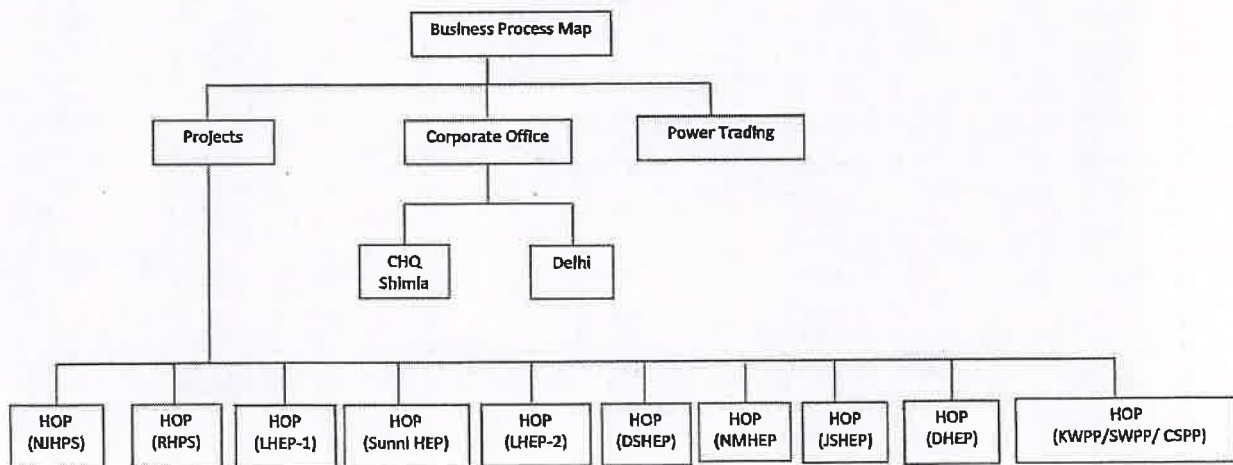


- Insolvency and Bankruptcy Code, 2016
- Right to Information (Indirect measure to deal with corruption in India, special reference to the Public entities)
- CVC Manual
- Fraud during recruitment

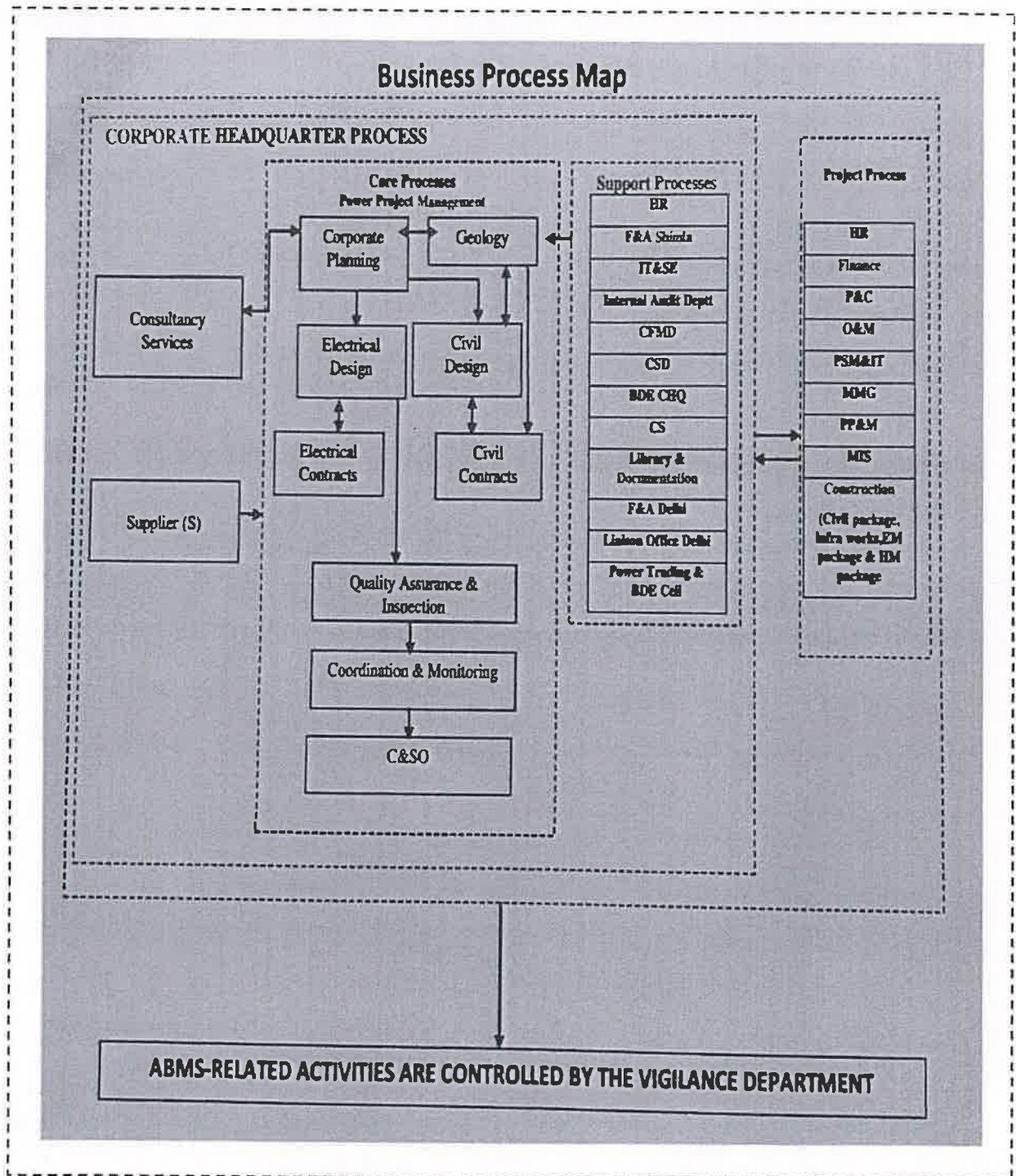
Institutionalized arrangements

- Central Vigilance Commission
- Office of the Auditor and Comptroller General
- Enforcement Directorate
- Serious Fraud Investigation Office
- SJVN CDA Rules

4.4 Anti-Bribery Management System and its Interaction



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4.5 Anti-Bribery Risk Assessment

SJVN has established a system to prepare a risk assessment Methodology in respect of ABMS related to the internal and external issues identified under clause 2 of this section. SJVN will undertake a regular bribery risk assessment(s) to assess risks at regular intervals, at least once a year, or as and when a bribery incident is reported. SJVN has considered the Bribery related incidents that happened in the past and established metrics to assess the level of risk.

For normal processes-related risks where the Bribery risk is LOW or NONE, is addressed under the QMS Manual, reference documents No. M-SJVN-01. Bribery-related (inputs from past issues/concerns) is documented in a risk register mentioned below. The Risk assessment method is described under section 6 of the ABMS manual.

Records of risk assessment shall be retained as referred below.

Cross Reference: ABMS Risk Assessment Register Document No. SJVN/ABMS/RA/01, revision 00.

4.6 Responsibility & Authorisation related to ABMS Manual

It is the responsibility of the top management to decide the contents & policies described in this manual. The effort for evolving this manual is coordinated by the Deputy CVO, who will act as an ABMS Management Representative (MR)). The Manual will be finally approved by the Top management.

4.7 Issue & Distribution Control

The title page of the manual gives the manual Document No., Issue No., Revision No. and its date of issue. The ABMS MR is responsible for maintaining the master copy of this

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manual duly identified by the original signatures of the approving authority on the cover page.

For the operation of the ABMS described in this manual, the copies are marked with distinct copy nos. & issued to the required functions by the ABMS MR duly stamped as 'controlled copy'. However, a copy of the same with the watermark "Controlled Copy" has been uploaded on SJVN intranet IP which shall be readily available to SJVN's employees for its use. Printing of this document is prohibited. However, if felt necessary to print this document, the same must be destroyed after use/reference/discussion by means of shredding. The printouts of these copies have no significance and are only meant to serve the purpose of reference. ABMS MR office is not responsible for the authenticity of these printout copies.

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SECTION 5.0 LEADERSHIP

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5.0 LEADERSHIP

5.1 Purpose

The purpose of this section is to describe the Roles & Responsibilities of the Key Leadership Personnel and the ABMS policy.

Roles & Responsibility

GOVERNING BODY:

The Board of Directors of SJVN acts as Governing Body, which demonstrates leadership and commitment concerning the anti-bribery management system. The roles and responsibilities of the Governing Body, related to the Anti-Bribery Management System will be as under, apart from other normal duties:

- a) approving the organization'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 the 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.

TOP MANAGEMENT:

For ABMS CMD, SJVN will be the Top Management, who will demonstrate leadership and commitment concerning the Anti-Bribery Management System. The roles, and responsibilities related to Anti-Bribery Management System will be as under, apart from his/her normal duties:

- 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.



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- 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 person will suffer retaliation, discrimination, or disciplinary action for reports made in good faith, or based on 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 SJVN losing business (except where the individual participated in the violation) at planned intervals, reporting to the governing body (if any) on the content and the operation of the anti-bribery management system and the allegations of serious or systematic bribery.

Other than Governing Body, and CVO the roles and responsibilities of key SJVN personnel will be as under, related to ABMS, and this will be other than their normal duties:

Director (Personnel)

Act as a link between the Governing Body and Personnel & Administration divisions in the corporate office & the projects.



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As a functional director, he will have a dual role, viz. helping in shaping the policies of the corporate body & in reviewing the overall performance in his area of P & A. As a Director-in-charge of the P & A, he would be responsible for the formulation & execution of the entire gamut of P & A functions.

To maintain effective links with organizations like CEA, SEBs, NHPC, BHEL, REC, etc.

Director (Project)

Responsible for the design & construction works of the projects in his area.

As a functional director, he will have a dual role, viz. helping in shaping the policies of the corporate office & in reviewing & monitoring the overall performance in his area. As a Director-in-charge of the construction & design wing of civil & electrical works including Transmission Lines, he would be responsible for the execution of his functional responsibilities.

To maintain effective links with organizations like CEA, SEBs, NHPC, BHEL, REC, etc.

Director (Finance)

To advise the CMD & BODs on important matters having a financial bearing on the affairs of the corporation

To help the CMD & BODs in framing financial policies & monitoring their implementation

To have functional control & authority including financial powers & accounting functions as decentralized to managers & officers down the line.

HOD (Corporate Planning)

- Preparation of short-term & long-term plans for the Corporation.
- Seeking investment decisions from the Govt. for new project execution.
- Seeking approval of cost revision and time schedules of ongoing projects.

HOD (Corporate Monitoring & Coordination)

- Coordination & monitoring for project implementation and Power Generation.
- Measurement of internal customer satisfaction and follow-up from project customers.



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HOD (Civil Design)

- Coordination for investigation & feasibility study.
- Preparation of detailed project report.
- In charge of civil designing & hydro Mechanical designing.
- Coordination with hydro-mechanical contracting.
- In charge of consultancy services provided by the Corporation.
- In charge of library services.
- Measurement of customer satisfaction and related follow-up action for clients of consultancy services.

HOD (Electrical Design)

In charge of all Electro-Mechanical designing activities.

HOD (Civil Contracts/ DRB)

In charge of civil contracting.

HOD (Electrical Contracts)

In charge of Electro-mechanical contracting.

HOD (Quality Assurance & Inspection)

In charge of all QA & Inspection activities related to Electro-Mechanical & Hydro-Mechanical contracting.

HOD (Corporate Geology)

In charge of all Geological activities.

HOD (Commercial & System Operation)

- All activities related to commercial and system operations with the beneficiaries, e.g. signing of PPA, raising of bills & collection of payments, etc.
- Measurement of External Customer satisfaction & their follow-up from beneficiaries of power.
- System operation of power stations.
- Insurance of Commissioned Plants.

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HOD (Personnel & Administration)

In charge of all HRD activities including :

- Manpower planning and recruitment
- Training
- In charge of the promotion of the official language Hindi.
- In charge of miscellaneous procurement.
- In charge of the estate and other administration activities.
- In charge of resettlement & rehabilitation activities of the organization at head offices.
- Legal examination & vetting of various SJVNL documents.
- Overall, in charge of Industrial relations & welfare activities of the corporation.
- Management of transport
- HR policy making
- Maintenance of all personnel files & all other establishment-related activities (e.g., probation, confirmation, leave account, LTC, Loans, Promotion transfers, salary administration, etc.
- All jobs related to corporate communication including printing, advertisement, press relation, management information, photography, filming, and participation in trade fairs, etc.

HOD (Finance & Accounts)

- Organizing funds for the organization and its management.
- In charge of all transaction & accounting activities, e.g., financial concurrence, processing of bills, payment, salary, PF gratuity, etc.
- In charge of preparatory audits & account audits and compliance accounts policy and procedures.

HOD (Business Development & Management Services- Solar, Hydro & Wind)

Coordination with internal & external agencies for monitoring, expediting, and reporting the status of critical activities and works of the Solar, Hydro & Wind Power Projects and other jobs assigned by the CMD.



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Coordination regarding Foreign Hydro Power Projects.

HOD (Corporate Environment)

Incharge of all corporate environment management activities

HOD (Corporate Facility Management Deptt- Corporate Building)

Incharge of construction activities related to the corporate office building at Shimla.

All Heads of Department / Sections

- Control of records about their areas, including their retention
- Internal communication within the department/section
- Identification of training needs of the deptt. Personnel.
- Maintaining relevant QMS process effectiveness to achieve key performance results.
- Action on audit Non-Conformities in their respective areas.
- Raising requisitions for resources for the achievement of QMS effectiveness.
- Raising requests for changes to QMS documents, as required.

HOD (Information Technology & System Excellence)

- In charge of providing & maintaining IT& V-Sat base communication infrastructure to various departments.
- Responsibility for establishing, implementing, and maintaining QMS.
- Reporting to top management on QMS performance and the need for improvements.
- Document Control related to QMS.
- Internal communication within the organization on QMS effectiveness.
- Ensuring awareness of Customer requirements within the organization.
- Coordination for the conduct of Internal QMS Audits.
- Calling QMS Management Review Meetings (MRMs)
- Obtaining progress -reports on action plans arising from MRMs.
- Selection of Auditors.
- Review of internal QMS audit effectiveness and closure of internal QMS audit NCs.



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Head of Project

- Heading the different teams and departments, such as MIS, engineering, construction, procurement, and operations & maintenance, to ensure effective collaboration and timely completion of project milestones.
- Primary point of contact for regulatory bodies, local communities, and contractors.
- Heading the Project site Level Risk Steering Committee to identify potential risks and develop risk mitigation strategies to minimize their impact on the project.
- To ensure that the project adheres to quality standards and specifications
- To provide the necessary approval for procurement and works related to the project as per the DOP guidelines.

ABMS MANAGEMENT REPRESENTATIVE (ABMS):

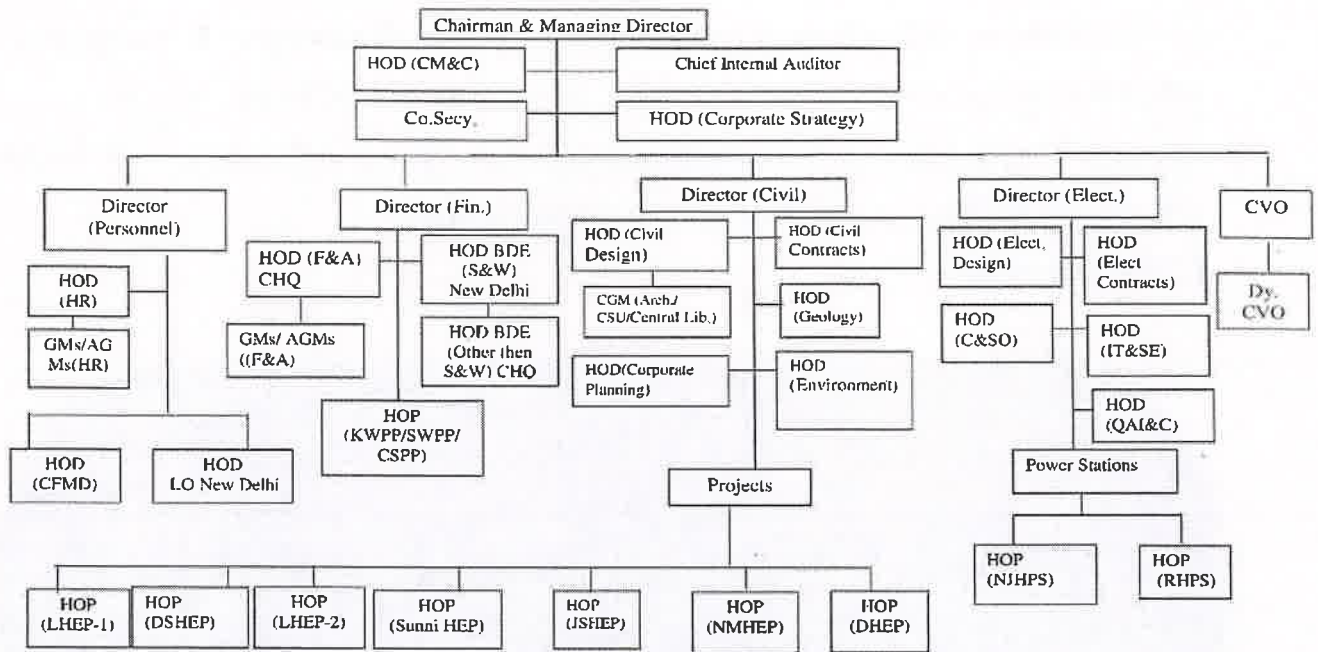
- The Top Management has appointed Deputy CVO as ABMS Management Representative (MR) for ABMS.
- ABMS MR is responsible and authorized for ensuring that Anti Bribery Management Systems are established, implemented, and maintained by ISO 37001:2016.
- ABMS MR will be responsible for reporting on the performance of Systems to the Top Management for review as a basis for the improvement of Systems.
- ABMS MR will be responsible for liaising with external certification bodies on behalf of the management for ISO 37001:2016 and its maintenance.

ALL EMPLOYEES OF SJVN

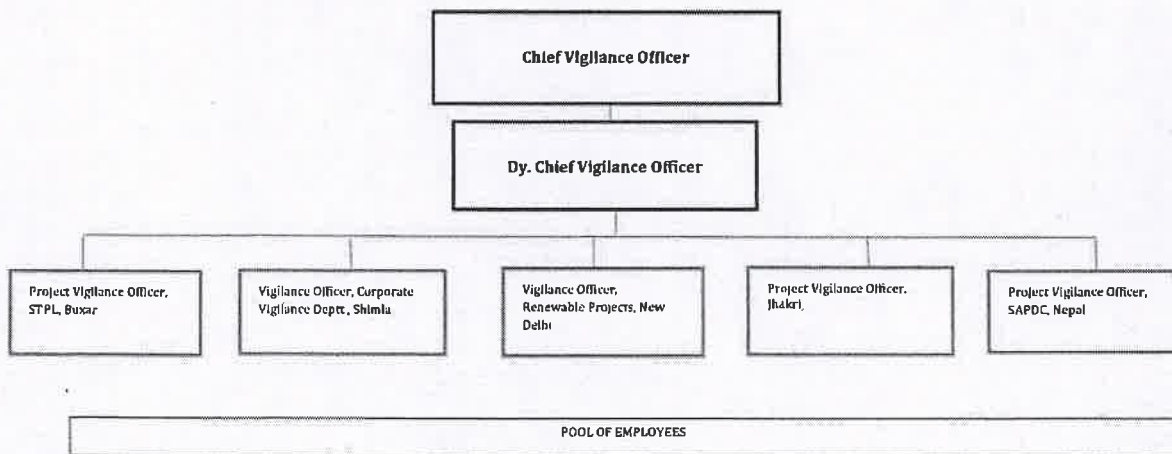
- All Employees of SJVN shall understand the importance and requirements of ABMS of SJVN.
- All Employees of SJVN shall abide by all the requirements, and report to the Competent Authority/CVO/Vigilance Department if any ABMS-related Non-Compliance is identified.



OVERALL ORGANIZATION CHART



VIGILANCE DEPARTMENT ORGANIZATION CHART



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5.2 Anti-bribery policy:

SJVN is committed to Provisioning for Electricity Generation, Transmission & Trading, and associated related activities for Hydro Power, Solar Power & Wind Power through customer friendly, efficient, 'Transparent system' and carries out all its activities in a manner that ensures an effective 'Anti-Bribery Management System'.

SJVN ABMS POLICY

SJVN is committed for prohibition of bribery through compliance with applicable anti bribery laws by continually improving anti bribery management system for setting, reviewing and achieving anti bribery objectives by satisfying anti bribery management system requirements for generation, transmission and trading of power.

SJVN has defined authority and independence to the anti-bribery compliance function which encourages raising genuine concerns without fear of reprisal and make all employee aware about consequences of not complying with above policy.

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5.3 ANTI-BRIBERY COMPLIANCE FUNCTIONS:

The top management has assigned the ABMS Compliance function to the **Vigilance**

Department:

The vigilance department will be responsible for:

- a) overseeing the designing, establishing, and maintaining of the ABMS Manual.
- b) implementation of the ABMS
- c) providing advice and guidance to personnel on the anti-bribery management system and issues relating to bribery, and where necessary providing training and awareness of ABMS.
- d) ensuring that the anti-bribery management system conforms to the requirements of CVC Rule 2021 and ISO 37001:2016.
- e) reporting on the performance of the ABMS to the governing body and top management and other compliance functions as appropriate.

CROSS-REFERENCE: CVC MANUAL 2021

5.4 DELEGATED DECISION-MAKING:

CVO (the Top Management) may delegate Deputy CVO the authority for the making of decisions about which there is more than a low risk of bribery.

The delegation of power shall be done through an office order issued by CVO.

Wherever Deputy CVO takes a decision, the process shall be reviewed by Top Management, from time to time, or as appropriate to avoid any potential conflicts of interest. Top management will ensure that these processes are reviewed periodically as part of its role and responsibility for implementation.



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SECTION 6.0 PLANNING

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6.0 PLANNING

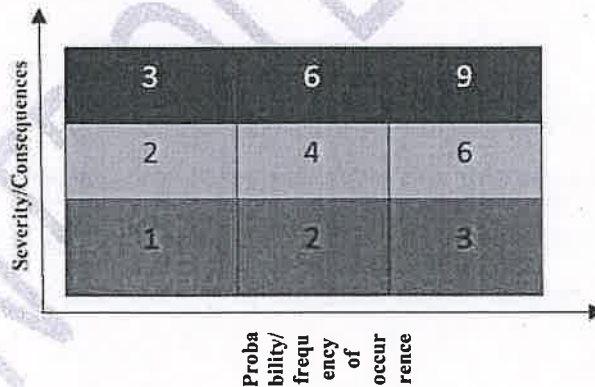
6.1 Purpose

The purpose of this section is to describe the Risk assessment method, controls/mitigation plan for the risks, and definition of the Risk level. This section will also describe the objectives and its plan to achieve them.

6.2 Risk Assessment and Plan to Mitigate/Control:

The Risk Assessment for the issues identified under section 4.0 shall be carried out as per the following methodology:

- a) The method adopted by SJVN for determining ABMS-related risks shall be a product of the Probability/Frequency of occurrence of an issue multiplied by the Severity/consequences that can arise or be initiated from the identified issue.
- b) The metrics to determine the risk level shall be as follows:



- c) Probability/Frequency of Occurrence:

Probability/Frequency	Score
Once in three years	1
Once in two years	2
Once or more than once a year	3

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d) Severity/Consequences:

Severity/Consequences	Score
No corruption charges found	1
the investigation transferred to the external agency (e.g., CBI MOP, Ombudsmen, etc.)/Suspension/Case under investigation/Minor Penalty,	2
Prosecution/Termination/Charge sheeted/Major Penalty	3

e) Risk Level:

i. **High:**

- I. When the product of Severity/Consequences, and Probability/Frequency is 9. that means both Severity/Consequences and Probability/Frequency is at 3 each
- II. When the product of Severity/Consequences and Probability/Frequency is 6, but Severity/Consequences is 3.
- III. When the product of Severity/Consequences and Probability/Frequency is 1, but Severity/Consequences is 3.

ii. **Moderate:**

- I. When the product of Severity/Consequences, and Probability/Frequency is 6, with a condition that the Severity/Consequences is 2.
- II. When the product of Severity/Consequences and Probability/Frequency is 4, that means both Severity/Consequences and Probability/Frequency is at 2 each.
- III. When the product of Severity/Consequences and Probability/Frequency is 2, Where Severity/Consequences is 2 but Probability/Frequency is at 1.

iii. **Low:**

- I. When the product of Severity/Consequences, and Probability/Frequency is 3, with a condition that the Severity/Consequences is 1.



- II. When the product of Severity/Consequences and Probability/Frequency is 2, that means Severity/Consequences is at 1 and Probability/Frequency is at 2.
- III. When the product of Severity/Consequences and Probability/Frequency is 1, that means both Severity/Consequences and Probability/Frequency is at 1 each.

f) Risk Mitigation/Control Plan:

The Risk Mitigation/Control plan is described in the Risk Register for at least **Significant Risks**.

A process approach has been followed while assessing the risk for ABMS purposes. SJVN has done the risk assessment in accordance with ISO 31000:2018 for all activities of all the business processes. Through a brainstorming session activities that have the probability of ABMS (considering the 3-year historical data) are retained in the ABMS risk register.

Cross Reference: The Risk Register SJVN/ABMS/RA/01.

Cross Reference: Risk Management System Apex Manual DOC: SJVN-RM-AM-01

6.2 Compliance objectives and planning to achieve them:

The Vigilance Department has determined, documented, and established Compliance Objectives. The established compliance objectives are measured and monitored on a regular basis and analysed to determine the effectiveness of ABMS, as well as compliance. The analysis is done once a year. There is a weightage determined to establish, for each objective, which describes the overall performance of the ABMS/Compliances.

Cross Reference: The Objectives SJVN/ABMS/OBJ/01.

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A planning sheet is prepared for the determined and established objectives (BSC Objectives), within 15 days from approval of Top Management. The planning sheet describes how the objectives will be achieved.

Cross Reference: The Plan for Objectives SJVN/ABMS/OBJ/02

6.3 Changes to ABMS

As appropriate, necessary SJVN will identify the need for changes to the ABMS. SJVN will observe the following controls while planning for changes:

- a) The purpose of the changes and their potential consequences.
- b) The design and operational effectiveness of the ABMS.
- c) The availability of adequate resources.
- d) The allocation or reallocation of responsibilities and authorities.

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SECTION 7.0 SUPPORT

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7.0 SUPPORT

7.1 Purpose

The purpose of this section is to describe the extent of support, in terms of Resources, required for effectively implementing ABMS.

7.1. A Resources

The Governing Body and the Top Management of SJVN have provided the resources needed for establishing, implementing, maintaining, and continually improving the ABMS.

7.2 Competence

SJVN has:

- a) Determined the necessary competence of person(s) doing work under its control that affects its ABMS performance.
- b) Ensured that these persons are competent based on appropriate education, training, or experience.

SJVN will provide training, etc., where necessary, to acquire the necessary competence, and will evaluate the effectiveness of the actions taken.

Records are being maintained, as evidence of competence.

Cross Reference:

1. Training Plan and Orientation training record
2. Competency Clause of HR manual - Section 5, clause no 36.2
3. Guidelines for posting manpower in Vigilance department issued vide IOM no. SJVN/CHQ/HR (Policy)/(130)/Sec-1/863 dated 02.05.2024.

7.2. A Employment process

SJVN follows the employment process (Recruitment Process), as described in its HR Manual.

Cross Reference:

1. Sr. No. 1,2,3,6,7, 9, 10, 11 of volume – I of HRM
2. Rule no. 5, 20 to 31 & 38 of CDA
3. Whistle blower policy document.



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4. PRP policy – HR manual vol-I – Sr. no. 17.
5. Delegation of Powers (2020 edition)

7.3. A Training

SJVN provides relevant personnel with training, from the time of commencement of employment and at planned intervals, or as and when needed, and or as guided by the Departments.

While identifying the needs for training following are being considered:

- a) That the training is appropriate to the roles of personnel and the ABMS risks to which personnel are exposed.
- b) The effectiveness of the training is assessed through feedback system.
- c) Training needs reviewed regularly, by the departments, and are provided to HR for arranging the training.

The content of the training will include identified ABMS Risks and awareness of the established ABMS. This may include the Business Associates and other relevant interested parties. While determining the need for training to Business Associates priority shall be given to those who pose a compliance risk to the SJVN.

Training records are retained by the HR training department.

Cross Reference:

1. Training plan and Training record.
2. Induction training program.

7.3. B Awareness

SJVN has adequate resources through various channels and appropriate methods to provide awareness to its employees regarding:

- a) The ABMS policy.
- b) Their contribution to the effectiveness of the ABMS, including the benefits of improved compliance performance.
- c) The implications of not conforming with the ABMS.
- d) The appropriate methods and processes for ABMS-related concerns.



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- e) The importance of the ABMS policy and the compliance obligations relevant to their role.
- f) The importance of supporting ABMS culture.
- g) Awareness to business associates is being provided by incorporating an anti-bribery clause in tender documents.

Cross-reference:

1. Training Plan and Training record
2. Integrity Pact/Tender Document Terms & Condition as per circular number: SJVN/CHQ/CCD/Circular/2023-496 Dated 04.07.2023 and SJVN/CHQ/Vig/2023-306-323 Dated 11.07.2023

7.4 Communication

Internal Communication

SJVN Vigilance department will be responsible for communication related to ABMS for the SJVN employees.

While communicating Vigilance department shall ensure that:

- a) It includes communication of its compliance culture, objectives, and obligations.
- b) Communication is consistent.

External Communication

SJVN Vigilance department will be responsible for external communication related to compliance with Interested parties (Like MOP/External investigation agencies etc.).

The departments involved in procurement/contract/work order will be responsible for external communication of the Integrity Pact/Procurement Policy consisting of corruption and subsequent consequences details.

External Communication by the Vigilance department will be done as per CVC Manual 2021.

Cross Reference: Clause no. 3.3, 9.5, 6.11 & 6.12 of CVC manual.

Cross Reference: Circular No. SJVN/CHQ/CCD/Circular/2023-496 Dated 04.07.2023 and SJVN/CHQ/Vig/2023-306-323 Dated 11.07.2023



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7.5 Document Control

Creating and Updating:

a) For ABMS related Documents following System shall be maintained

S.No.	Type of Document	Document Identification
1	Manual	SJVN/ABMS/MN/... (Serial No.)
2	Procedure	SJVN/ABMS/PR/... (Serial No.)
3	Risk Register	SJVN/ABMS/RA/... (Serial No.)
4	Formats	SJVN/ABMS/FR/... (Serial No.)

Apart from the identification No. (as mentioned above), Issue No., Revision No., and Effective date of implementation shall also be mentioned.

The initial issues of the above-listed document shall have Issue No. 01, Revision No. 00, and the actual date of implementation.

Under normal circumstances Issue No. will be changed to 02 after 10 revisions or as deemed necessary by SJVN.

A list of documents, as listed above shall be maintained in the format below:

Format No. SJVN/ABMS/FR/01

LIST OF SYSTEM RELATED DOCUMENTS

Sr. No.	Type of Document	Document No.	Current Issue No.	Current Revision No.	Effective date of implementation



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Format No. SJVN/ABMS/FR/02

LIST OF SYSTEM-RELATED RECORDS

Sr. No.	Name of the record	Document No.	Maintained by
1.	List of Documents	SJVN/ABMS/FR/01	
2.	List of records	SJVN/ABMS/FR/02	
3.	List of External Origin Document	SJVN/ABMS/FR/03	

A list of External Origin Documents (like, Rules, Statutes, etc.) is maintained as below:

Format No. SJVN/ABMS/FR/03

LIST OF EXTERNAL ORIGIN DOCUMENTS

Sr. No.	Name of the record	Current Revision Status	Maintained by
1.	Vigilance Manual	2021	

- b) For ABMS compliance-related records, the same shall be maintained and retained as per HR Manual Volume III, and ABMS system-related documents shall be retained for 3 Years.

Cross Reference: HR Manual Volume III, Sr. No. 61 (pages no 1129 to 1177)



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Approval:

Following Matrix shall be followed for the approval of system-related documents:

S.No.	Type of Document	Approval Authority
1.	Manual	CMD
2.	Procedure	Deputy CVO
3.	Formats	Deputy CVO

Deputy CVO shall be responsible for implementing the aforesaid document control system.

7.5.A Control of Records

Records required by the ABMS and by ISO 37001:2016 will be controlled to ensure:

- That they are available and suitable for use, where and when it is needed.
- That they are adequately protected (e.g., from loss of confidentiality, improper use, or loss of integrity).

The Records shall be retained as described under clause 7.5 (b) of this section.

The disposition of the documented information shall be done as per SJVN Policy.

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SECTION 8.0 OPERATION CONTROL

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8.0 OPERATION CONTROL

8.1 Purpose

The purpose of this section is to describe the extent of controls needed/required to effectively implement ABMS.

8.2 Planning and Control

SJVN has identified the necessary controls, determined from the output of the Risk Assessment Process. The details of criteria and controls for ABMS operation are documented in CVC Manual (Vigilance Manual 2021).

Records as required by the Vigilance Manual 2021 are maintained and retained to have confidence that the processes have been carried out as planned.

The following activities are being carried out in the Vigilance department:

Process Activities

SN	Description
1	Logging of complaints
2	Action, as appropriate according to the type of complaint (details are provided below)
3	Systemic Improvements on the Outcome
4	Preparation of Quarterly Performance Report, Quarterly Progress Report of works in progress, and Quarterly Report on Action Plan
5	Preparation of Agreed List and List of Officers of Doubtful Integrity (ODI)
6	Vigilance clearance/status for following administrative functions / personal purposes
7	Scrutiny of Audit Reports
8	Scrutiny of Property Returns
9	Routine/Periodic and Surprise Inspections
10	CTE type Inspections

The planning of changes and reviewing the consequences of unintended changes, taking action to mitigate any adverse effects, will be done through the Risk Assessment process.



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SJVN has laid appropriate controls for externally provided processes, products, or services, that are relevant to the ABMS.

SJVN Vigilance department carries out inspections, as planned or as necessary, to monitor that the third-party processes are effectively controlled.

8.3 Controls and Procedures

SJVN has determined necessary and effective controls to manage its compliance obligations and associated compliance risks. These controls are maintained, in accordance with Vigilance Manual 2021, periodically reviewed, as per Vigilance Manual 2021, and tested in accordance with Vigilance Manual 2021, to ensure their continuing effectiveness.

8.4 Raising concerns

SJVN has identified sources from where concerns can be raised:

PROCESS INPUTS

SN	Input	Source
01	Complaints	CVC / MOP / Public / Employee of the Organization / CBI.
02	Letter of Awards, Quarterly progress report of the works in progress, Monthly progress report of the contracts having award value more than 5.00 Lacs.	Procurement & Contracts Deptt. of the concerned units, or HR Procurement, or Electrical Contracts Deptt., or Civil Contracts Deptt., or concerned units & deptt., or Site Vigilance Units.
03	Audit Reports (Internal Audit Report / Statutory Audit Report / CAG Report)	Internal Audit, or concerned projects, or corporate finance deptt.
04	Request for Vigilance Clearance / Status	Concerned HR Deptt.
05	Annual property return / Intimation of Moveable / Immovable Property	Concerned Employee
06	Percentage of E-payments, Percentage of	Procurement & Contracts Deptt. of the



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SN	Input	Source
	procurement through CPP & Percentage of E-tendering /GeM, Sensitive Posts, Details of the Scrutiny of Audit Reports, Inspections, Scrutiny of Files, etc. (Data for preparation of Quarterly Progress Reports).	concerned units, or HR Procurement, or Electrical Contracts Deptt. or Civil Contracts Deptt. or concerned units & deptts. or Site Vigilance Units or Corporate HR Deptt.
07	Disciplinary Proceedings (In case of Misconduct)	Complaints/Inspections.

Complaint Handling Process:

The Vigilance Deptt. maintains a complaint register where every complaint, irrespective of its source, is entered in the complaint register chronologically as it is received or taken notice of in the prescribed format as defined in the CVC manual Chapter III, **Annexure I**. A complaint containing allegations against several officers may be treated as one complaint for the purpose of statistical returns. The Process of raising concerns/complaints is followed as per Vigilance Manual 2021 and is made available through bidding documents. Vigilance Department will not treat/register anonymous/pseudonymous Complaints/concerns, as per the guidelines specified in Govt. Of India Vigilance manual 2021.

While registering the complaints, SJVN Vigilance Department will ensure that:

- It is treated confidentially.
- Individuals/Business Associates are protected from retaliation.
- Advice/Resolution/Communication is followed as per Vigilance Manual 2021.

SJVN ensures that all personnel are aware of the reporting procedures, their rights, and protections and can use them.

8.5 Investigation/Action initiating processes

SJVN initiates investigation/action as described below to ensure that there is fair and impartial decision-making:

I. Action on the complaints forwarded by Central Vigilance Commission:



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The commission may forward the complaints for either of the following:

- i. For factual report.
- ii. Investigation and call for Investigation & Report (I&R)
- iii. For necessary action (N.A.).

II. Action on complaints where a Factual report is sought:

The factual report to the commission, based on scrutiny of relevant records/documents only, shall be submitted to the commission within a period of thirty days of the receipt of the complaint/communication from the commission, as per CVC guidelines. The concerned vigilance unit / corporate vigilance deptt. seeks confirmation from the complainant through registered post for owning or disowning the complaint, as the case may be, together with a copy of his identity proof.

III. Action on complaints where Investigation & Report is sought:

The action on the complaints where Investigation & Report is sought by the commission shall be taken as per Para 4.2 (c) & (d) of the complaint handling mechanism of the commission circulated vide no. 021/VG/051-500040 dated 24.12.2021. Confirmation from the complainant for owning or disowning the complaint is not required in this case, as in such cases commission seeks confirmation from the complainant as per the complaint handling mechanism.

IV. Complaints forwarded for Necessary action (N.A.):

The CVO / Corporate Vigilance Deptt. is required to scrutinize the complaint thoroughly and CVO will decide action on such complaints within a period of two months of the receipt of the complaint from the commission. Before initiating action on the complaints received for necessary action, the concerned vigilance unit / corporate vigilance deptt. seeks confirmation from the complainant through registered post for owning or disowning the complaint, as the case may be, together with a copy of his identity proof.



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The action on the complaints forwarded by the commission for N.A. shall be taken as per Para 4.3.1 (iii), (iv) of the complaint handling mechanism of the commission circulated vide no. 021/VG/051-500040 dated 24.12.2021 and Para 2 (D.) circulated vide no. 021/VG/051 dated 03.11.2022.

V. Action on complaints forwarded by the Ministry of Power:

Each complaint will be examined by the Chief Vigilance Officer and the following action should be taken:

- a) If the allegations are vague, general, and prime facie unverifiable, the complaint may be dropped and filed by CVO. Wherever considered necessary Head of the Department may also be consulted.
- b) A further check, a preliminary inquiry/investigation may be made to verify the allegations to decide whether or not, the public servant concerned should be proceeded against departmentally or in the court of law or both if the complaint gives definite information to do so.

VI. Action on complaints received directly by CVO, SJVN / SJVN against below Board Level Officers:

Before initiating action on such complaints, the concerned vigilance unit/corporate vigilance deptt. seeks confirmation from the complainant through registered post for owning or disowning the complaint, as the case may be. The complainant is also required to provide a copy of his/her identity proof. A communication in this regard is sent to the complainant, and he/she is required to respond within 15 days of the receipt of the communication from the concerned vigilance unit/corporate vigilance deptt. However, in case of non-receipt of the response within 15 days from the complainant, a reminder is also sent to him / her giving another opportunity, In case of non-response after 15 days of the reminder, the complaint would be filed treating it as a pseudonymous complaint.

In case of verification of the complainant, further action of preparation of the factual report will be taken. The factual report will be prepared based on scrutiny of



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relevant records/documents only. The factual report will conclude whether the allegations are substantiated or not. If the allegations are not substantiated, the complaint will not be pursued further and the same will be closed. If allegations are substantiated, a detailed vigilance investigation will be carried out.

If a detailed investigation is carried out & lapses are found and the officers of the level of E-8 and E-9 or a group of officers wherein officers of the level of E-8/ E-9 are also involved and are responsible for the lapses, the case shall be submitted to the CVC for first stage advice and the further action shall be taken as per CVC guidelines. If the officers involved are of E-7 & below level and lapses are found, initially the decision against the existence of the vigilance angle shall be taken by the CVO. In case there is a difference of opinion, between the Disciplinary authority and CVO regarding the existence of a vigilance angle, further action shall be taken as per CVC guidelines.

In the case of PIDPI complaints, the commission has jurisdiction over all officers (irrespective of their levels) of the organizations covered under the commission's jurisdiction. Therefore, in case of PIDPI complaints the investigation reports will be sent to the commission for all categories of the officers.

VII. Handling of the complaints against Board Level Officials received directly by CVO, SJVN:

If a complaint against a Board Level appointee is directly received by CVO, SJVN / SJVN, the CVO shall forward the same to the CVO of the Ministry of Power, Govt. of India. If the CVO of MOP, GOI asks for a factual report against the Board Level Appointee from the CVO, SJVN, the CVO, SJVN will send the report to the CVO of MOP, GOI, after endorsing a copy of the report to the CMD, SJVN.

VIII. Action on Anonymous and Pseudonymous Complaints:

No action shall be taken on Anonymous and Pseudonymous Complaints. This is as per CVC Guidelines specified in the Vigilance Manual 2021.

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IX. Action on PIDPI Complaints:

As per the PIDPI resolution 2004 & amendment to PIDPI resolution dated 14.08.2013, the Central Vigilance Commission and the Chief Vigilance officer of the Ministry of Power are the designated authorities for receiving the PIDPI complaints. The guidelines for PIDPI complainants shall be as per Para 6.3 of the complaint handling mechanism of the commission circulated vide no. 021/VG/051-500040 dated 24.12.2021 and Para 2 (F) circulated vide no. 021/VG/051 dated 03.11.2022. The process of confirmation of PIDPI complainant shall be as per Para 6.4 (c) of the complaint handling mechanism of the commission circulated vide no. 021/VG/051-500040 dated 24.12.2021. The timeline for submission of investigation reports in PIDPI complaints referred by the commission shall be 12 weeks from the date of receipt of a reference from the commission.

8.6 Other Operational Controls:

Various Timelines related to complaints:

The specified timelines in Para 7.3 of the complaint handling mechanism of the commission circulated vide no. 021/VG/051-500040 dated 24.12.2021 and Para 2 (G) circulated vide no. 021/VG/051 dated 03.11.2022 shall be adhered to.

Miscellaneous (Systemic Improvements):

Every complaint and the resultant investigation report shall be scrutinized thoroughly to find out the possibility of the systemic lacunae that may have resulted in irregular acts being committed by the suspected officials. The outcome of such scrutiny should be utilized to devise and implement systemic improvements to stop the recurrence of such irregular acts.

Preparation of Quarterly Performance Report, Quarterly Progress Report of works in progress, and Quarterly Report on Action Plan:

- QPRs & Quarterly Report on action plan shall be prepared and submitted to CVC & MOP respectively every quarter as per the directives of CVC & MOP.



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- b. The designated officer shall collect the data from the procurement & Contracts Deptt. of the concerned units / HR / Electrical Contracts Deptt. / Civil Contracts Deptt. / concerned units /deptts. / Site Vigilance Units and compile them in the specified formats as per CVC / MOP.
- c. The QPRs & Quarterly Report on the action plan will be approved by the CVO and after that, the same will be submitted to CVC & MOP respectively.
- d. A copy of the report will be retained in the respective file for reference.

Preparation of Agreed List and List of Officers of Doubtful Integrity (ODI):

Agreed List:

The agreed list will contain the names of those executives against whose integrity or honesty, there are complaints doubts or suspicions. The agreed list will be settled between the CMD and the SP of the local branch of CBI / ACB. These agreed lists will remain in force for one year from the date of preparation. At the end of this period, the list will be reviewed and the name of those officers against whom there is not sufficient evidence to proceed will be deleted from the list. The action in respect of officers on these agreed lists shall be taken as per Para 7 of Ministry of Home Affairs O.M. No. 130/1/66-AVD dated 5th May 1966.

List of Officers of Doubtful Integrity (ODI):

It will include names of those officers only who, after inquiry or during the course of an inquiry, have been found to be lacking in integrity. The list of executives of doubtful integrity shall be prepared & maintained as per the scheme laid down in Ministry of Home Affairs O.M. No. 105/1/66-AVD-I dated 28.10.1969. The ODI list will be jointly signed by the CMD and CVO of the organization concerned and shared with the CBI. The Central Bureau of Investigation will suggest the addition or deletion of names based on information available to them and return the lists to Secretaries/Heads of Departments concerned.



When the name of an officer will be entered into the list for good and adequate reasons, it will not be removed until a period of three years has elapsed. The period of three years for which the name will be current on the list will count from the date of punishment in disciplinary proceedings or from the date of conviction in a court trial. After this period, the cases of such officers may be reviewed by the Ministry/Department concerned in consultation with the Central Bureau of Investigation and if during the intervening period, there has been no further complaint or information against the officer touching on his integrity, the name may be removed from the list. If at the time of review, it is proposed to continue the name of an officer on the list, cogent reasons for doing so should exist.

Vigilance Clearance/status:

1. The Vigilance department issues vigilance clearance/status for following administrative functions / personal purposes.
 - a. Before giving NOC for passport / private visit abroad.
 - b. Closing of probation period.
 - c. Forwarding of application to another organization.
 - d. Before promotion / looking after arrangements.
 - e. Before sponsoring foreign training/seminars/visits/deputation/projects/assignments.
 - f. At the time of superannuation.
 - g. At the time of resignation.
 - h. At the time of proposing the name of an employee for any national award/certificate.
 - i. Posting of officials in the vigilance department.
 - j. Serving Govt. employees who are proposed to be taken on permanent absorption or on a deputation basis in SJVN, Vigilance clearance from the parent cadre of the Govt. employee as well as from the Vigilance department of the organization where the employee is serving.
 - k. Repatriation of deputations to their parent cadre.

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- l. Releasing of final dues / withheld payments of the employees.
 - m. Termination of service / Pre-mature retirement.
 - n. Re-employment / commercial employment after retirement, only where such events occur within 1 year from the date of retirement.
2. The vigilance clearance /status will be provided through an online vigilance clearance portal.
 3. After receipt of a request from the HR department, the concerned vigilance officer examines the type of request and verifies the records related to Annual Property returns, intimation of moveable and immovable property about the concerned employee available in the vigilance deptt., penalties imposed on the employee (if any), etc. and process the case accordingly. In case of any anomalies in the records of the employee/misconduct, the vigilance status/clearance shall not be given.
 4. The vigilance clearance /status for all purposes/functions listed above in respect of all employees upto E7 shall be approved/issued by Dy. CVO. However, a quarterly report of such clearances is approved by Dy. CVO shall be put up to the CVO.
 5. The vigilance clearance /status for all purposes/functions listed above in respect of employees above E7 shall be approved/issued by CVO.

Scrutiny of Audit Reports: The Vigilance deptt. will look into reports of internal audits, statutory audits, and Comptroller & Auditor General with the objective of identifying vigilance issues / to check whether any cases of misconduct or corruption are revealed in them. In case of any misconduct or corruption, the necessary action shall be taken as per SJVN Conduct Rules and CVC guidelines.

Property Returns:

1. All employees of the organization are required to submit their annual property returns in accordance with the guidelines set by the Central Vigilance Commission (CVC) and within the specified time frame.
2. The property return will be submitted online through ERP/SAP.



3. Vigilance clearance shall not be issued to the employee(s), if the employee(s) will not submit the APR, as per the SJVN CDA rules.
4. The vigilance department will conduct a thorough review and scrutiny of the property returns of the employees as per CVC guidelines. The vigilance deptt. Will scrutinize immovable property returns of at least 20% of executive employees every year. In case of any misconduct/vigilance angle, a detailed investigation will be carried out & action shall be taken as per SJVN CDA rules.

Routine / Periodic and Surprise Inspections: The CVO / Vigilance deptt. Shall conduct/carry out regular and surprise inspections in sensitive areas to keep a check on aberrant and corrupt or improper practices by the public servants.

In the course of an inspection, if issues involving vigilance angle– reflecting gross negligence, grave procedural irregularities, financial imprudence resulting in loss to the organization, malafide, etc. will be found, then suitable disciplinary action or otherwise, against the officials found responsible shall be taken as per the CDA rules of SJVN.

In the matters found lacking in one aspect or the other, in the course of the examination, systemic improvements shall be advised as a measure of preventive vigilance and better performance in times to come.

CTE type Inspection:

CTE-type inspection will be carried out to ensure better economy and efficiency in the procurement process and thereby achieve financially and qualitatively better output, in a fair, equitable, and transparent manner. CTE-type inspection will be carried out in accordance with the guidelines issued by CVC. The report of CTE type inspection shall be submitted to CVO through Dy. CVO.

In the course of an Intensive Examination, if issues involving vigilance angle– reflecting gross negligence, grave procedural irregularities, financial imprudence resulting in loss to the organization, malafide, etc. will be found, then suitable



disciplinary action or otherwise, against the officials found responsible shall be taken as per the CDA rules of SJVN. Punitive actions, recovery, or any other suitable administrative action, are also advised against the defaulting firms / Contractors.

In the matters found lacking in one aspect or the other, in the course of the examination, systemic improvements shall be advised as a measure of preventive vigilance and better performance in times to come.

The selection of procurement cases for Intensive Examination by the CVO shall be done out of the procurement cases reported through QPRs and those which have not been reported to the Commission. Each Chief Vigilance Officer shall carry out an Intensive Examination of not less than 6 procurement cases of different natures (supply, works/services/consultancy, etc.) in a year. Preferably, selection should be done in such a manner that, at least, 3 cases of large value, 2 cases of medium value, and 1 case of small value are selected for Intensive Examination. Chief Vigilance Officer shall inform CTEO about the details of contracts selected for Intensive Examination, to avoid duplicity of examination by the CTEO and the Chief Vigilance Officer, if any.

Further, the schedule of the various activities related to intensive examination as per CVC guidelines shall be adhered to.

Process outputs (Records)

S.No.	Output
01	QPRs
02	Vigilance clearance/status
03	Resolution of Complaint
04	Systematic improvement
05	Actions as per CDA/CVC Guidelines
06	ODI List / Agreed List



As a part of its commitment to ABMS, SJVN has determined, documented, and maintained additional Operation Controls as below:

S.No.	Controls for	Documented in
1	Gifts, hospitality, donation, and similar benefits, including entertainment and hospitality, political or charitable donations, and client representative or public official travel	Rule 12 of CDA rules.
2	Financial Controls	Delegation of Powers (2020 edition), HRM, and circulars issued from time to time.
3	Non-Financial Controls	Procurement and works policy (Latest edition)
4	Due Diligence Process	Chapter 11, 14 & 15 of Procurement and Works policy and Rule 29 of Recruitment policy of HRM vol I.
5	Bidding Process	Chapters 8, 9, 10, 12 & 16 of Procurement and works policy (Latest edition)
6	Single Bidder approval authority	Delegation of Powers (2020 edition)
7	Gift Reporting process	As per rule 12 of CDA

The controls may include:

For Gifts, Hospitalities, Donation, and Similar benefits:

- Awareness regarding gifts, hospitality, donations, and similar benefits can be perceived by a third party (business competitor, judge, press, prosecutor) to be for a purpose of bribery even if neither the giver nor the receiver intended it.
- Frequencies of gifts and hospitality.
- Approval in advance of gifts and hospitality.

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- Gifts and hospitality above a defined value.
- Effective Documentation of Gifts and hospitality.

Financial controls to manage bribery risks:

- Implementation of separation of duties so the same person cannot both initiate and approve the payment.
- Appropriate tiered level of authority for payment approval (higher transactions require more senior management approval).
- Verification of the payee's appointment and work of service carried out has been approved by the organization's approval mechanism.
- Requiring at least two signatures on payment approvals.

Non-Financial Controls

- Use of approved contractors, sub-contractors, suppliers, and consultants that have undergone a prequalification process under which the likelihood of their participation in bribery is assessed including due diligence.
- Assessment of:
 - Necessity and legitimacy of the services to be provided by a business associate (excluding clients or customers).
 - Services were properly carried out.
 - Payments to business associates are reasonable and proportionate regarding those services to avoid the risk that business associates use part of the payment made to pay a bribe on behalf of or for the benefit of the organization (e.g., large commission or contingency fee paid to increase the risk of improper use by an agent to induce public official or employee of the client to award contract)
 - Appropriately documenting that the services have been provided.
- Award of contracts, where possible and reasonable only after a fair and where appropriate transparent competitive tender/Bidding process as per the work procurement policy of SJVN



- Appropriate approvals are taken, from the competent authority, before awarding the contract to Single Party.

Due Diligence Process:

The extent of controls for the 'Due Diligence process' applied in SJVN includes the information to assess bribery for:

- Specific transactions, projects, activities
- Business associates and personnel in accordance with the bribery risk nature and extent
- Updating the due diligence at defined frequencies, so the changes and new information are taken into account.

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SECTION 9.0 PERFORMANCE EVALUATION

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9.0 PERFORMANCE EVALUATION

9.1 Purpose

The purpose of this section is to describe the extent of Monitoring, Measurement, and Analysis to be done to evaluate the performance of ABMS. This section will also describe the process for Internal Audit, and Management Review, to determine the effectiveness of ABMS.

9.1.A Monitoring, measurement, analysis, and evaluation

SJVN has an appropriate, and adequate process to monitor, measure, analyze, and evaluate continuously. The activities are carried out as mentioned/specified in Vigilance Manual 2021 (Under CVC Manual).

I. Sources of feedback on compliance performance:

SJVN has identified, although not limited, the sources for feedback and compliance performance. A detailed description of this is provided under Section 8 of the ABMS Manual.

Cross Reference: Clause 4, Clause 6 of Section 8 of ABMS Manual.

II. Development of indicators:

The Performance indicators for the Vigilance Department of SJVN, are developed in the form of Objectives. Planning is done to achieve them, as described under Section 6 of the ABMS Manual. Top Management has determined the weightage for each indicator to evaluate ABMS performance.

Cross Reference: The Objectives SJVN/ABMS/OBJ/03

III. Compliance reporting:

SJVN has identified the necessary reporting required as per Vigilance Manual 2021, which is also described under Section 8 of ABMS Manual, as Vigilance department process output.

- QPRs
- Vigilance clearance/status



- Resolution of Complaint
- Systematic improvement
- Charge Sheet/Penalty(ies)
- ODI List / Agreed List

IV. Record-keeping:

SJVN has identified necessary records required to be maintained and retained. The details of such records which are required to be maintained and retained are mentioned in SJVN HR Manual. The reference to this is also mentioned in ABMS Manual section 7.

Cross Reference: HR Manual Volume III, Sr. No. 61 (pages no 1129 to 1177)

Cross Reference: Clause 8 of Section 7 of ABMS Manual.

9.2 Internal Audits

SJVN has established, documented, and implemented a process to carry out Internal Audits to determine the degree of compliance with ABMS. The criteria, against which the degree of compliance is to be established are:

- ABMS Manual
- Statutory and Regulator Requirements, as mentioned in section 4 of the ABMS Manual
- CVC Manual (Vigilance Manual 2021)
- Other (Governing Body, Customer, Interested Party, etc.) Requirements.

Cross Reference: Procedure for Internal Audit SJVN/ABMS/PR/01

9.3 REVIEW BY VIGILANCE DEPARTMENT:

Vigilance Department shall conduct internal meeting at least once a three months and collect the information for reporting to Top management about its functioning. The data from these meetings forms the input related to performance.

Cross Reference: Minutes of compliance function



9.4 Management review

The Top management will chair the Management Review Meeting and will review the effectiveness of ABMS, at planned intervals, at least once a year, or as needed, to ensure its continuing suitability, adequacy, and effectiveness.

Inputs for Management Reviews

The following inputs are considered for management review, but not limited to:

- a) The status of actions from previous management reviews.
- b) Changes in external and internal issues that are relevant to the ABMS.
- c) Changes in needs and expectations of interested parties that are relevant to the ABMS.
- d) Information on the ABMS performance, including trends in:
 - i. nonconformities, noncompliance, and corrective actions.
 - ii. monitoring and measurement results.
 - iii. Audit results.
- e) Opportunities for continual improvement.

The Top management will also consider the following during the management Review:

- a) The adequacy of the ABMS policy.
- b) The independence of the Vigilance Department.
- c) The extent to which the compliance objectives have been met.
- d) The adequacy of resources.
- e) Adequacy of the ABMS risks assessment.
- f) The effectiveness of existing controls and performance indicators.
- g) Communication from persons raising concerns, and interested parties, including feedback, and complaints.
- h) Investigations.
- i) The effectiveness of the reporting system.



The output of Management Review

The output of the management review includes decisions related to continual improvement opportunities and any need for changes to the ABMS.

Records of Management Review proceedings are maintained, as evidence of the output of management reviews.

The Top Management will apprise the Governing Body regarding management review and shall take their approval for further action. Records of approval will be maintained.

9.5 Governing Body Review:

The minutes of ABMS Management reviews are being sent to the governing body through top management, for their reviews and any suggestion for improvement. The governing body may provide inputs for further improvement which shall be taken up by the Vigilance department for further implementation.

Cross Reference: Records of intimation of ABMS MRM to Governing Body.



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**SECTION 10.0
CONTINUAL
IMPROVEMENT**

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**10.0 CONTINUAL IMPROVEMENT****10.1 Purpose**

The purpose of this section is to describe the process, and consideration for Continual improvement in SJVN.

1. Handling of Nonconformities**a) Nonconformities related to Corruption, including bribery:**

SJVN has established a process to take inputs of the nonconformities, from the complaint register CVC Manual chapter III, Annexure I, (as described under Section 8 of this ABMS Manual).

Cross-reference: Clause 4 of Section 8 of ABMS Manual

Each of the nonconformity is reviewed, analysed/investigated/reported, as described in Section 8 of this ABMS Manual.

Cross-reference: Clause 5 of Section 8 of ABMS Manual

Corrections, Corrective Actions, and other Actions are initiated as per CVC described under Vigilance Manual 2021, and opportunities for improvement are identified for implementation as described under Section 8 of ABMS Manual.

Cross-reference: Clause 6 of Section 8 of ABMS Manual

b) Nonconformities related to Internal Audits

The nonconformities, or opportunities for improvement identified during Internal Audits, are reviewed, analysed and Corrections, Corrective Actions, and other actions are initiated as mentioned in Internal Audit Procedure.

Cross Reference: Procedure for Internal Audit SJVN/ABMS/PR/01