

ETHICS COMMUNICATION

October 2026

Exercising Authority Safely to Prevent Unethical Practice

Exercising authority effectively and safely means balancing operational control with strict ethical oversight. Managers, leaders, and approvers must use their professional authority to ensure billing integrity, protect the Company's reputation, and guide their teams toward compliance so as to avoid unethical practice of recording or processing Invoice received from any party in an unauthorized, unfair, or misleading manner for personal gain.



Que: How to Exercise Authority safely

Ans:

- Establish Clear Approval Hierarchies
- Enforce Strict Documentation Reviews
- Foster an Open Compliance Culture
- Take Direct Action on Deviations.

Que: What are common examples of unsafe exercise of one's authority

Ans:

- **Overbilling:** Passing of over Invoice amount then market prevalent rate without a valid reason.
- **Billing for goods/services not provided:** Invoicing for work, goods, hours, or services never delivered by accounting transactions via creating false notes or report on different dates for goods not received.
- **Duplicate billing:** Charging twice for the same transactions or services or expenses.
- **Inflating expenses:** Showing expenses higher than the actual amount incurred.
- **False or fabricated expenses:** Creating fake expenses or supporting documents to recover money.
- **Unauthorized charges:** Adding unapproved fees, penalties, commissions, or other charges.
- **Misrepresenting services:** Changing the description of an expense to make an unauthorized charge appear legitimate.
- **Incorrect quantities/hours:** Reporting more units, hours, materials, or resources than actually used.
- **Manipulating Invoices:** Altering dates, amounts, descriptions, or quantities for improper financial gain.
- **Charging personal expenses:** Including an employee's personal expenses in the client's bill.
- **Billing without authorization:** Invoicing without following the company's prescribed approval process.
- **Improper discounts/rebates:** Giving unauthorized discounts or recording them incorrectly for personal gain.
- **Misuse of advance payments:** Using goods or service providers advance given or their funds for personal requirements of funds.
- **Kickbacks/secret commissions:** Inflating bills or approving improper payments in exchange for personal benefits.



Que: What are the consequences of Inappropriate Client Billing and Payment?

Ans. For employees:

- Disciplinary action, up to and including termination of employment
- Recovery of any loss or improper gain from the employee
- Withholding of increments, incentives or promotions
- Reporting to regulatory or law enforcement authorities where laws on fraud, bribery, corruption or money laundering are breached

For value chain partners:

- Rejection of invoices and recovery or set-off of amounts wrongly billed or paid
- Suspension or termination of the contract and removal from the approved partner list
- Legal action, including claims for damages

For the company:

- Loss of trust with goods and service providers, contract termination
- Regulatory penalties, fines and legal proceedings
- Misstated financial records and weakened internal controls



You should report about such incidences in following manner;

In case you are an employee by login to the website (SGC and ethicsline link) or by an email to ethicsline@gfl.co.in

In case you are any Stakeholder by email to ethicsline@gfl.co.in

Please note that Employee and Stakeholder Grievance or Concern will be directed to the Chief Ethics Officer without disclosing their identity.