	<b>MANORAMA INDUSTRIES LIMITED</b>	Document No	MI/POL/09/02
	<b>INDIA</b>	Issue Date:	01.04.2018
	<b>POLICY ON ANTI-CORRUPTION &amp; ANTI-BRIBERY</b>	Page 1 of 3	

Bribery is offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. It is our policy to conduct all of our business in an honest and ethical manner.

We take a zero- tolerance approach to bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

## OBJECTIVE

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the Company's business is conducted in a socially responsible manner.

## SCOPE

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as employees in this policy).

This policy covers:

- Bribes - Employees must not engage in any form of bribery, either directly or through any third party (such as an agent or distributor).

- Gifts and hospitality

Employees must not offer or give any gift or hospitality

- which could be regarded as illegal or improper, or which violates the recipient's policies; or
- to any public employee or government officials or representatives, or politicians or political parties; or


Employees may not accept any gift or hospitality from our business partners if:

- it is in cash; or
- there is any suggestion that a return favour will be expected or implied

If it is not appropriate to decline the offer of a gift, the gift may be accepted, provided it is then declared to the employee's manager and donated to charity.

We recognize that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of HOD should be sought.

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	<b>INDIA</b>	Issue Date:	01.04.2018
	<b>POLICY ON ANTI-CORRUPTION &amp; ANTI-BRIBERY</b>	Page 2 of 3	

#### Facilitation Payments:

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to. Our strict policy is that facilitation payments must not be paid.

#### Political Contributions:

We do not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

#### Charitable Contributions:

Charitable support and donations are acceptable (and indeed are encouraged), whether of in-kind services, knowledge, time, or direct financial contributions. However, employees must be careful to ensure that charitable contributions are not used as a scheme to conceal bribery. We only make charitable donations that are legal and ethical under local laws and practices]. No donation must be offered or made without the prior approval of [the compliance manager. All charitable contributions should be publicly disclosed.

#### Responsibilities:

KMP, Human Resources & HOD

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of this policy. The employee must notify Head of Department (HR) or concern HOD as soon as possible if you believe or suspect that a conflict with or breach of this policy has occurred, or may occur in the future. Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach the policy.

#### Record Keeping:

You must declare and keep a written record of all gifts accepted or offered, which will be subject to management review.

You must ensure all expenses claims relating to charities, donations made to the third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

#### How to raise a concern

The employees are encouraged to raise concerns about any issue or suspicion of such malpractice at the earliest possible stage. If, unsure whether a particular act constitutes bribery or corruption, or if you have any other queries or concerns, these such concerns should be raised with your HOD (HR) OR HOD of the concern Department.

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# MANORAMA INDUSTRIES LIMITED

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Issue Date:

01.04.2018

## POLICY ON ANTI-CORRUPTION & ANTI-BRIBERY

Page 3 of 3

What to do if you are a victim of bribery or corruption

It is important that you inform HOD (HR) or notify your HOD as soon as possible if you are offered a bribe by a third party, if, asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

### Protection

Employees who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavorable treatment connected with raising a concern.

### Training and communication

Training on this policy forms part of the induction process for all new employees. All existing employees will receive regular, relevant training on how to implement and adhere to this policy. In addition, all employees will be asked to formally accept conformance to this policy on an annual basis. Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

### Monitoring and Reviewing

KMP, HOD (HR), HOD is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness. Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

Any need for improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to HOD (HR).

## Manorama Industries Limited

**Mr. Gautam Kumar Pal**

**Director**

**01.07.2023**

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