



## **I G PETROCHEMICALS LIMITED - ANTI-BRIBERY POLICY**

### **PREAMBLE**

The Anti-bribery and Anti-Corruption Policy (“Policy”) of I G Petrochemicals Limited (“IGPL”) has been developed in alignment with IGPL’s vigil mechanism/whistle-blower policy and in conformance with the legal and statutory framework of anti-bribery and anti-corruption legislation prevalent in India.

The Policy reflects the commitment of IGPL and its management to maintaining the highest ethical standards while undertaking open and fair business and culture, following the best practices of corporate governance, and enhancing IGPL’s reputation at appropriate levels.

It is Company’s policy to conduct all of its business in an honest and ethical manner.

The Policy applies to all Directors, officers, employees and consultants of IGPL. Compliance with this Policy constitutes terms of service for each Director, conditions of employment for each officer and employee, and conditions of providing services to IGPL for each consultant.

### **POLICY OBJECTIVES**

We have zero tolerance for any mal and corrupt practices. This Policy sets out the minimum standard that must be followed at all times. Where any local regulations are stricter than this Policy, they will take precedence over this Policy.

### **DEFINITIONS:**

The Prevention of Corruption (Amendment) Act 2018 (“the Act”) seeks to bring the Indian anti-corruption legal framework in conformity with current international practices laid down by the United Nations Convention against Corruption (UNCAC). The Amendment Act now also defines Commercial Organizations and introduces the concept of corporate liability, covering all categories of Commercial Organizations.

**Bribe/ Bribery:** means the offering, promising, giving, receiving, soliciting or accepting of a financial or other advantage, or any other thing of value, with the intention of influencing or rewarding the behaviour of a person in a position of trust to perform a public, commercial or legal function to obtain or retain a commercial advantage. Bribes are payments made in the form of money or anything of value in return for a business favour or advantage.

For e.g. Gifts taken or received to unfairly influence a business outcome, facilitation payments made for facilitating the performance of a routine governmental action etc. (can family members also be included in the same)

## **SCOPE OF THE POLICY**

IGPL prohibits all forms of Bribery and corruption practices involving, but not limited to, Government Official or a private sector person or Company. Company Representatives must not engage in any form of bribery, in dealings with any Public Official, private party or any third party (such as an agent or third-party intermediary) either directly or indirectly, in order to improperly influence any act or decision of a person, or to otherwise gain an improper benefit for the Company.

IGPL shall prohibit the making or accepting of Facilitation Payments of any kind for any favours to facilitate or expedite official business or work.

IGPL shall conduct its business lawfully and ethically and also expects every Stakeholder to conduct its business with integrity.

No gifts including cash gifts, hospitality or entertainment be offered or provided in exchange for any favour (or promise of any favour) for or benefit to IGPL under any circumstances to any Government Official or any private person or any third party.

Individuals involved in corrupt activity may be fined which also includes imprisonment as per the provisions of the Act.

Employees who learn of a violation or suspected violation of Anti-Corruption Laws are required to take immediate action. It is their duty to report this wrongdoing by contacting their head of the department immediately.

The principle is to not offer nor accept gifts/hospitality, except when such offering or accepting is a matter of courtesy in normal business relations.

If any Employee has any query about this Policy, they should contact their reporting authority.

Dissemination of this Policy for new joiners shall be carried out at the time of induction by the HR Department.

## **PROCEDURE TO BE FOLLOWED**

An Investigating Committee may be formed to look into any complaints as may be received by the Company. The Committee shall investigate and may call for further information or particulars from the complainant and at its discretion, consider involving any other/additional Officer of the Company and/or Committee and/ or an outside agency for the purpose of investigation.

If an investigation leads to a conclusion that an improper or unethical act has been committed involving payment or receipt of Bribe the Investigating Committee shall recommend to the Board of Directors of the Company to take such disciplinary or corrective action as it may deem fit.

## **AMENDMENT**

The Company reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and Directors unless the same is notified to them in writing.