

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. PREAMBLE

IG Petrochemicals Limited ("IGPL") is committed to conducting all business with integrity and honesty, in compliance with the Prevention of Corruption (Amendment) Act, 2018, and applicable SEBI governance requirements. This Policy applies to all Directors, officers, employees, consultants, vendors, suppliers, agents, and business partners.

Zero tolerance for bribery and corruption.

2. DEFINITIONS

Public Official: Any person holding legislative, administrative, or judicial position at any level of government, including state-owned enterprise officials and their family members.

Bribery: Offering, promising, or giving anything of value to improperly influence any person's decision or to obtain business advantage.

Facilitation Payments: Unofficial payments to expedite government actions. **Strictly prohibited.**

Kickbacks: Payments or benefits in return for contract awards or improper commercial gain. **Prohibited.**

Third Party: Agents, intermediaries, vendors, suppliers, contractors, consultants, or any entity acting on IGPL's behalf. **IGPL is liable for their conduct.**

Anything of Value: Cash, gifts, discounts, entertainment, travel, employment opportunities, donations, or any benefit of worth.

Conflict of Interest: Personal interests that interfere with professional duties—must be disclosed immediately.

3. WHAT IS PROHIBITED

IGPL strictly prohibits:

- Offering or giving gifts/payments to any Public Official or private person to influence decisions
- Facilitation payments of any kind, under any circumstances
- Kickbacks, rebates, or payments disguised as commissions
- Cash gifts or gift vouchers
- Using agents or intermediaries to make improper payments on behalf of IGPL
- Excessive hospitality or entertainment intended to secure business advantage
- Undisclosed conflicts of interest

- Any circumvention of this Policy through third parties

5. CONFLICT OF INTEREST

- Declare conflicts immediately when they arise
 - Failure to disclose = grounds for disciplinary action
 - Company will determine how to manage disclosed conflicts
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6. DUE DILIGENCE ON THIRD PARTIES

Before engaging any vendor, agent, or intermediary:

- Verify credentials and business legitimacy
 - Conduct background checks for high-risk engagements
 - Obtain anti-bribery representations and warranties
 - Document all due diligence findings
 - Do not engage if unable to obtain satisfactory representations
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7. REPORTING VIOLATIONS

Report suspected violations immediately through:

1. **Direct Supervisor or Department Head**
2. **Compliance Officer**
3. **Anonymous Whistleblower e-mail at complaints@igpetro.com**

No retaliation permitted. Whistleblowers are protected from termination, demotion, harassment, or adverse action.

8. INVESTIGATION PROCEDURE

- Investigation begins within **15 days** of complaint
 - Concludes within **60 days** (extendable if justified)
 - Complainant updated at 30-day intervals
 - Investigator ensures natural justice—accused has right to respond
 - Investigation remains confidential
 - Report submitted to Audit Committee
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9. DISCIPLINARY ACTION FOR VIOLATIONS

First Offense (Moderate Violation):

- Written warning
- Mandatory retraining
- 12-month monitoring

Second Offense or Serious Violation:

- Suspension (14-30 days)
- Intensive training
- 24-month monitoring
- Formal notice of potential termination

Third Offense or Severe Violation:

- **Immediate termination**
- Criminal referral to authorities
- Debarment from rehiring

Additional Consequences:

- Recovery of benefits received through violation
- Criminal prosecution under Prevention of Corruption Act, 2018
- Referral to CBI, ACB, or SEBI
- Corporate liability for IGPL

12. DOCUMENTATION AND RECORDS

- Maintain records for **minimum 5 years**:
 - Gift and hospitality approvals
 - Due diligence files
 - Training records
 - Investigation findings
 - Compliance certifications
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14. POLICY AMENDMENTS

- Board of Directors approves all amendments
- Amendments communicated to all stakeholders within 30 days
- Explanation of material changes provided with notification
- Policy reviewed annually minimum

**The above policy was adopted by the Board of Directors at their meeting held
on 3rd November, 2025**