



ANTI BRIBERY AND ANTI CORRUPTION POLICY



1. Introduction

Adherence to good Corporate Governance and managing its affairs in a fair, honest, ethical, transparent and legal manner is an integral part of the philosophy of DeltaFinochem Pvt Ltd, (*Ref to as Company*). Furtherance to its philosophy the Company formulates this Anti Bribery Policy to ensure that no employee of the Company indulges in and associate with any act of bribery, extortion or Corruption with any government officials or any person for or on behalf of the Company. This Anti-Bribery Policy is based on the law of Prevention of Corruption Act, 1988 of India and other similar applicable Anti Bribery and Anti-Corruption Laws of India and the World.

2. Scope and Applicability

This policy apply to all Directors and Other Employees of the Company (including employees temporarily transferred to affiliates and vendors), agents, representatives, or anyone else doing business in the name of or with the Company, including the suppliers, contractors, or subcontractors. The Company has a zero tolerance approach to acts of Bribery and Corruption, by employees or anyone acting on behalf of the Company. Any breach of this policy will be regarded as a serious matter by the Company of which is likely to result in disciplinary action.

3. Responsibility

Head-HR

4. Policy

- 4.1) No bribes of any sort shall be paid or accepted to or from customers, suppliers, politicians, government / public official, public advisors or representative's private person or Company for or on behalf of the Company for or in respect of any business or official matters or transactions of the Company.
- 4.2) Business meals or gifts offered to Public Officials should be within the range of normal social courtesies; There must be no circumstances that could give rise to any misunderstanding that such meal or gift is being offered with the intention of gaining any improper business advantage; Offering a meal or a gift should not violate the Anti-bribery Laws of

- the country which the Public Official works for; and The expense of the meal and/or gift should be accurately and properly recorded in the appropriate accounting books. This policy does not prohibit the practices of providing any customary gifts in a particular market, provided such gifts are appropriate and of reasonable nature in comparison to the general market practice and are properly recorded.
- 4.3) No promises of future employment (including for family members); or any personal favors, such as securing school admission for a family member, paying personal bills, or allowing the use of personal vehicles or vacation homes.

5. Working with Third Parties

DeltaFinochem engages Third Parties for a wide range of business activities; these may include providing local knowledge, handling logistics etc. These business arrangements are usually perfectly legitimate; however, company may be held responsible if a Third Party engages in corrupt conduct while acting on company's behalf.

To ensure that DeltaFinochem carefully selects the third parties for doing business, company has set few pre-screening procedures to evaluate the following criterias:

- a) Sales and services capabilities;
- b) Financial health;
- c) Ethical behavior and general integrity;
- d) Potential conflicts with DeltaFinochem ;
- e) Potential interaction with Government Officials;
- f) Compliance with anti-corruption regulations;
- g) Controls for revenue leakage and fraud risk; and

Third Parties who may potentially interact with Government Officials on behalf of DeltaFinochem will be subject to further evaluation and must be pre- approved by the HOD/ Director before the company enters into any engagement with such Third Parties.

Each Third Party is responsible for complying with DeltaFinochem's pre-screening procedures and meeting all on boarding requirements. Each Third Party is also responsible for keeping accurate records that demonstrate compliance with these requirements including any due diligence reports, pre engagement reviews and approvals, and anti-

corruption assurances in agreements and contracts.

6. Prohibited Activities

The Company Staff/covered parties should not offer and/or provide any pecuniary or other benefits to Public Officials either directly or indirectly (i.e. through a third party). Furthermore, if there is a possibility that any Business Entertainment could give rise to a misunderstanding that the Company has conducted the Business Entertainment with the intention of gaining an improper business advantage (irrespective of its genuine intention), the Company Staff should not offer the Business Entertainment in such situation offering any cash (including, but not limited to, bills/notes, cheques, every kind of cash voucher, stock certificates and securities;

Any business meal or gift if the expense is not properly recorded for in the appropriate accounting books and not as per the Code of Conduct Policy of the Company.

7. Policy on Invitation

There must be a legitimate purpose for the invitation of the Public Official, and there must be no circumstances giving rise to any misunderstanding that such invitation has been made with the intention of gaining any improper business advantage;

Any expense for the invitation borne by the Company should be limited to a reasonable amount or actual expenditure;

Any money to be paid by the Company shall not (in any way) provide any personal benefit to a Public Official;

Such invitation must not violate the Anti-Bribery laws of the relevant country which the public official works for

The expenses for the invitation should be accurately and properly recorded in the relevant accounting books.

8. Reporting Incidents of Bribery and Corruption

If any member of the Company staff discovers any intentional or accidental violation of this policy, such member of the Company staff should report such discovery to his / her supervisor or to the Director.

Investigation

DeltaFinochem Pvt Ltd will investigate seriously any actual or suspected breach of this policy. Employees may be subject to disciplinary action and which may ultimately result in dismissal. In case of third parties found to be bribing or attempting to bribe DeltaFinochem Pvt Ltd employees, they will be informed in writing, business dealings will be ceased and the appropriate authorities will be informed.

9. False allegations

Every effort will be made to ensure the validity of allegations before any action is taken by Head HR/ Business Head where allegations are found to be false, deliberately misleading or malicious, this will be dealt with as a serious matter and criminal or disciplinary proceedings may be taken against individuals concerned.

9.1) Investigation Process

a) HOD/ Business Head will deal with all allegations of fraud in line with the applicable standard procedures, where necessary and appropriate the Head HR will be notified in order that action can be taken to protect DeltaFinochem's assets and property.

b) HR Head will inform the Head of Business/ HOD , regarding all suspected and confirmed acts of fraud as soon as it is practical and as long as to do so will not compromise any criminal or disciplinary investigation into such acts.

c) Investigations will take account of the requirements of criminal law and advice will be sought at the earliest opportunity to determine whether the alleged act may constitute a criminal offence.

9.2) PREVENTION

9.2.1) To follow the Recruitment and Selection Process with Honesty and dignity

9.2.2) **All** employees are expected to follow all professional codes of conduct related to their role within the organization as well as those issued by their own professional bodies.

9.2.3) **All** employees are required to seek authorization for and to declare all offers of gifts and hospitality made to them and by them as set out in the Gifts and Bribe Policy and related SOP.

9.2.4) **All** employees are required to declare any business interests or secondary employment, including volunteer work as set out in the Business Interests, Secondary Employment and Voluntary Work SOP

9.2.5) **HR** Team will ensure that an effective disciplinary procedure is in place and is enforced by DeltaFinochem.

9.2.6) **All** Areas and departments within DeltaFinochem will conduct 'strategic fraud risk assessments' to identify areas in practice and procedure which are open to risk of fraud or corruption.

10. 10) Monitoring

The effectiveness of the policy will be regularly reviewed by the Management and will be amended if necessary to ensure it is inline with any legislative changes and any changes in DeltaFinochem Pvt Ltd activities.

SANDEEP DESHMIKH



DIRECTOR