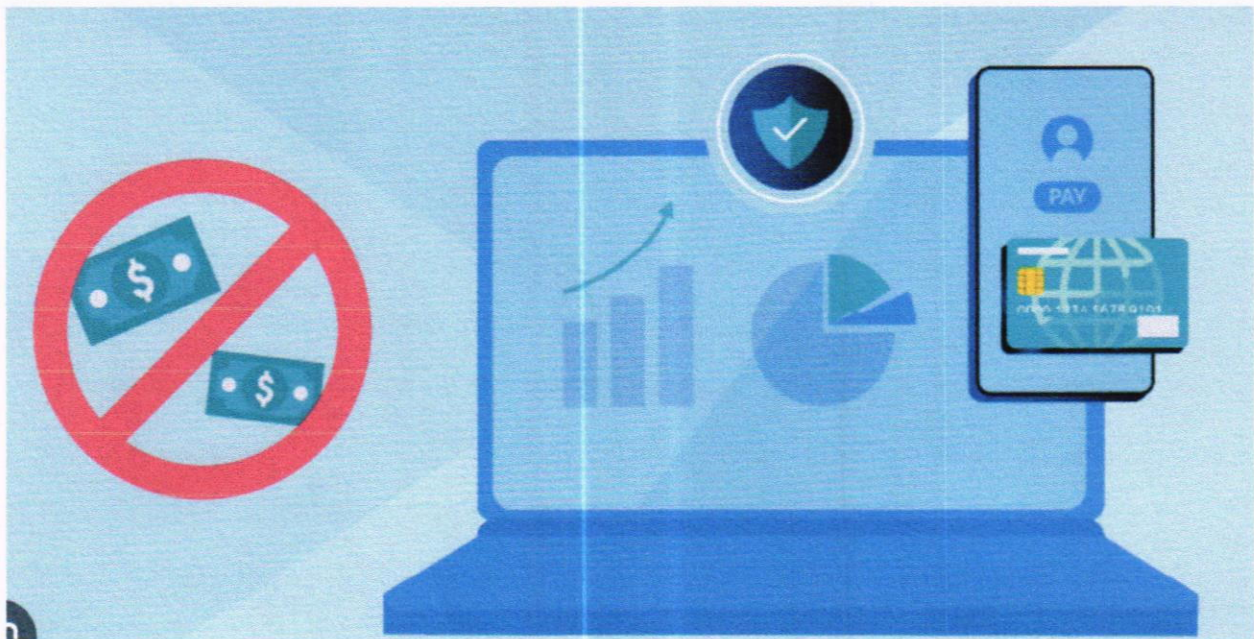





**RUBAMIN**

*The Joy of creating an institution!*



**ANTI-BRIBERY ANTI-CORRUPTION POLICY**

<b>Policy Title</b>	<b>Anti Bribery &amp; Anti Corruption (ABAC)</b>
Employee Value Proposition	Guideline and General Principles of conducts for employees
Applicability	This policy is applicable to all employees, its suppliers, service providers across Rubamin and its subsidiary Companies
Originator and Contact Information	Human Resource ( <a href="mailto:hrd@rubamin.com">hrd@rubamin.com</a> )
Effective Date	September 1, 2023
Prepared By	Human Resources Department
Approved By	Group Human Resources – Head 

**1. OBJECTIVE**

The Rubamin Private Limited (hereinafter referred to as “RPL” or “Company”) is committed to the highest standards of ethics and integrity and zero tolerance towards bribery and corruption. The code of conduct of the Company also emphasizes on the requirement of ethical business practices.

The Company recognizes and complies with all applicable laws and regulations in the various territories, the Company operates. The Company aim to safeguard and promote legitimate business and to prevent and prohibit corruption, bribery and similar acts in connection with its business. The purpose of this policy is to outline guiding principles and procedure.

**2. SCOPE & APPLICABILITY**

This policy shall be applicable and binding on all employees of, or any other person associated with the Company and for the purposes of this document includes all employees and associates with subsidiaries and affiliate companies and such other persons, including those acting on behalf of our Company, including directors, who in turn shall ensure that financial consultants, insurance intermediaries (corporate agents, brokers etc.), distributors, vendors, consultants, advisors, suppliers, contractors or other third parties engaged with the Company are aware of and adhere to these standards, across all locations. This policy should be read in conjunction with our Code of Conduct.

### **3. ANTI-BRIBERY & CORRUPTION**

Under no circumstances, any employee may offer, promise or grant anything of value to

- a) Government Official;
- b) Any person, or members of their family;
- c) A third party;
- d) Charitable organization suggested by such a recipient;
- e) Any other entity and/or individual, directly or indirectly related and having a conflict of interest with the employee; to influence the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with the Company.

### **4. RESPONSIBILITIES**

The Chairman & Managing Director has overall responsibility for ensuring that this Policy complies with our legal and ethical obligations and that all those under our control comply with it. Business Heads at all levels are responsible for ensuring that those reporting to them are made aware of and understand this Policy, undertake training on how to implement and adhere to it and also monitor compliance of it.

Management at all levels is responsible for ensuring that those reporting to them are made aware of and understand this Policy and attend regular training on how to implement and adhere to it. Every person to whom this policy applies is responsible for the success of this Policy and should ensure that he / she should use it to disclose any suspected activity or wrong-doing.

### **5. REPORTING OF CONCERNS AND INVESTIGATIONS**

All employees are encouraged to raise concerns about any bribery issue or any case of corrupt practice or any breach of this ABAC Policy or applicable ABAC law at the earliest. They may raise the concern either to their reporting manager or may follow the process mentioned under the whistle Blower Policy

of the Company. No personnel who in good faith, reports a violation of this ABAC Policy shall suffer any harassment, retaliation or adverse employment consequences.

The Audit Committee/ Board of Directors of the Company ("Board") shall have oversight of governance and compliance with this ABAC Policy. The Audit Committee will monitor the effectiveness and review the implementation of this ABAC Policy, considering its suitability, adequacy and effectiveness.

## **6. TRAINING & AWARENESS**

The Company will communicate the policy, procedures and its approach for the implementation of this policy to the employees. The Company shall also conduct regular seminars for imparting training to spread awareness about the importance of its commitment towards clean and ethical business processes. Every employee is bound to comply with anti-bribery policy, as part of the Code of Conduct. Besides, this policy shall also be published on the website of the Company.

## **7. REVIEW & EVALUATION**

The Company will monitor the effectiveness and review the implementation of this Policy, considering its suitability, adequacy and effectiveness. This Policy will be reviewed and updated whenever required and will also be hosted on the website of the Company.