



# **Anti- Corruption Policy**

## **1. Objective**

Indoco is committed to preventing and detecting fraud, bribery, and unethical business practices. The company strictly upholds its policy of not engaging in bribery or corruption in all its global operations. Indoco adheres to a philosophy of conducting business with utmost honesty, integrity, and ethical standards. This zero-tolerance culture allows Indoco to maintain a positive reputation with its Third Parties across various industries.

## **2. Scope**

This anti-bribery and anti-corruption policy (referred to as "Policy") applies to all individuals worldwide associated with Indoco affiliates and subsidiaries, regardless of their level or grade. This includes directors, senior executives, officers, permanent, fixed-term or temporary employees, consultants, contractors, trainees, seconded staff, casual workers, volunteers, interns, agents, and any other personnel affiliated with us.

The term "Third Party(ies)" in this Policy encompasses all individuals or entities with whom you interact while representing our organization. This includes past, present, and future customers, business partners, suppliers, consultants, intermediaries, representatives, subcontractors, agents, advisers, and joint ventures, as well as government and public bodies, including their officials, advisers, representatives, politicians, and political parties.

## **3. Definition**

A bribe refers to any form of encouragement, money, reward, or benefit given to someone with the intention of securing commercial, contractual, legal, or personal advantages. Directly or indirectly offering or accepting bribes is strictly prohibited. Bribing a public official or government member constitutes a separate criminal offence.

The term "bribe" encompasses anything of value, whether given directly or indirectly through a third party and includes cash, cash equivalents, gifts, insider information, sexual favours, corporate hospitality or entertainment, offering employment to a relative, as well as payment or reimbursement of travel expenses. A "government/public official" is defined as any employee or official, elected or appointed, holding a governmental position, be it legislative, administrative, or judicial. This definition extends to candidates for such positions, representatives of government-owned companies, and representatives of political parties in any nation or territory.

Corruption involves the misconduct of authority figures or individuals in influential positions through illegal, immoral, or unethical methods. Bribery and patronage are commonly associated with corrupt practices.



#### **4. Third-Party Relations -**

Indoco expects all Third Parties engaged in business with the company to address bribery and corruption issues following the guidelines stated in this Policy. Maintaining a business relationship with Indoco requires Third Parties to cooperate and confirm compliance with these standards.

To ensure the utmost integrity in all dealings with Third Parties, it is essential to perform due diligence investigations to assess their integrity records before entering into any business relationship. The engagement process and final approval of any Third Party's selection should be thoroughly documented.

#### **5. Protection and protocol to raise complaints**

Many individuals may worry about potential consequences when they refuse to give or take a bribe, speak up about concerns, or report wrongdoing by others. At our company, we strongly encourage openness and will support anyone who, in line with this Policy, honestly expresses concerns in good faith, even if these concerns later prove to be unfounded.

Our commitment is to ensure that no one faces adverse treatment for refusing to participate in bribery or other forms of corruption or for reporting their genuine suspicions about such offences, whether past, ongoing, or potential future occurrences. If you believe you have experienced any unfavourable treatment, please immediately contact Mr. Rajan B. Saawant at email ID [rajan@indoco.com](mailto:rajan@indoco.com) or your manager. We are dedicated to upholding a culture of trust and integrity, where all employees can confidently raise concerns without fear of retaliation.

#### **6. Action and Training**

To achieve our goal of "Zero Tolerance" towards corruption, we will diligently follow and adhere to all Rules & Regulations. Through comprehensive training, we will ensure that every employee is familiar with the contents of these guidelines, reinforcing our commitment to preventing corruption.

The Senior Management team, including the Head of Locations, is dedicated to promoting awareness of the Company's policy on Good Corporate Governance among all employees. This collective effort will help foster a culture of integrity and ethical conduct throughout the organization.

#### **7. Board Level Oversight**

The Rajan Saawant holds the ultimate responsibility for ensuring that this Policy aligns with our legal and ethical obligations and that all individuals under our authority adhere to it.

At every managerial level, it is the duty of managers to ensure that their subordinates are fully informed about and comprehend this policy. They must also ensure that their team members receive proper training on how to implement and abide by the policy while diligently monitoring compliance.