

Himadri Speciality Chemical Ltd

Anti- Bribery & Corruption Policy

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Date	07.12.2023	07.12.2023	07.12.2023	08.12.2023



Purpose

Himadri has always upheld the ethical business conduct from its inception. Being a responsible corporate citizen, Himadri is aligned with timeless principle of United nation global compact (UNGC). This policy outlines Himadri's commitment to preventing corruption in all its forms, ensuring ethical conduct and establishing clear objectives to monitor and improve our anti- corruption efforts.

Scope

This policy applies to all Himadri facilities, including manufacturing plants and corporate offices & subsidiaries. It covers employees, contract employees (third-party employees engaged on our premises), visitors, customers, and anyone affected by our business activities.

Organization and Responsibilities

Himadri maintains a zero- tolerance approach to bribery and corruption. Any act of corruption, whether direct or indirect, will result in severe disciplinary actions, including termination and legal proceedings where appropriate. All employees must adhere to all elements of this policy and Himadri's code of conduct, which emphasizes integrity, honesty and transparency in all dealings. Senior management is committed to leading by example in promoting ethical behaviour and anti-corruption measures. We encourage open and honest reporting of any suspected corruption through multiple anonymous channels (Email, Hotline, Drop box etc.).

Our Beliefs

- Ethical business practices are essential to drive sustainable business
- Corruption undermines fundamental values of fairness, justice and equality
- Integrity is non-negotiable

Our Aims

- Zero tolerance towards all forms of bribery and corruption
- Create transparent, accountable and ethical environment
- Upheld integrity across all levels of organisation
- Compliance with legal standards and best practices
- Transparent reporting



Our Commitments

- Implementation of anti-corruption management system aligning ISO 37001:2018 across all operations by 2026
- Ensure 100% completion of mandatory training and awareness campaign for all employees by 2025 to reinforce importance of ethical behaviour, importance of integrity in the workplace and compliance with anti-corruption measures
- Conduct Due diligence audits on anti-bribery and anti-corruption practices for 100% facilities of Himadri.
- Track and resolve all reported bribery & corruption cases on fast track basis and same will be reported in BRSR section of annual report.
- Investigation and consequence management will be dealt as per the whistle blower policy/Vigil mechanism
- Employees and stakeholders who report corruption in good faith will be protected from retaliation and harassment.
- Prohibit all forms of bribery: employees must not offer, give or accept any form of bribe, kickback or other inducements to secure business advantages or influence decisions.
- Ensure all transactions related to gifting (inbound/outbound) are fully compliant with Gift and Hospitality policy.
- Suspicious transactions or activities must be reported to the compliance officer without delay.
- All conflicts will be managed in accordance with organisations conflict of interest guidelines to ensure decisions are made objectively and in best interest of the organisation.
- A designated compliance officer will oversee the implementation and enforcement of this policy.

Governance

This policy is governed by the Sustainability (ESG) Council of Himadri under the supervision of the Sustainability (ESG) Committee at the Board level.

Policy Review

This policy will be reviewed once in three years to assess its effectiveness and to update it in response to emerging risks and best practices.