

# Anti – Bribery and Anti-Corruption Policy

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*LT Foods Ltd.*

## **1. INTRODUCTION:**

LT Foods Limited along with its subsidiaries and group companies (hereinafter referred as the "Company") believes in conducting all its businesses in an honest and ethical manner. The Company takes a zero-tolerance approach to Bribery and Corruption and discourages it in any all forms. The Company is committed to acting professionally, fairly and with integrity in all its business dealings and relationships.

## **2. PURPOSE:**

This Policy has been formulated to establish set of responsibilities and guidelines to be followed by its employees and associates while conducting business. The purpose of this Policy is to establish guidance for Company's employees and Third Parties interacting with the Company to comply with applicable Anti-Corruption and Anti-Bribery Laws and Regulations, as well as to promote a culture of ethics and integrity.

This policy also aims at protecting the Company and all its associates' reputation as well as at avoiding potential civil and criminal fines.

## **3. SCOPE:**

This policy applies to all the members including employees (including part-time or full-time, permanent or contractual, trainee or intern and Directors), relevant third parties or to anyone acting on behalf of the Company (hereinafter collectively referred as "members") and shall be communicated to them at the outset of our business relationship and as appropriate thereafter.

## **4. GENERAL RESPONSIBILITIES OF MEMBERS:**

- a) To foster a culture of integrity throughout the organization and clearly communicating Company's expectations.
- b) No member will receive a gift or hospitality that may include but is not limited to any forms of entertainment or travel perks, goods or services such as cash or equivalents, vouchers, favours or privileges for friends and relatives, donations to designated charities, personal services or loans offered with an expectation to get business with the company.
- c) No member will promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- d) No member will give promise to give, or offer, a payment, gift or hospitality to a Public Official or Third Party to 'facilitate' or expedite a routine procedure.
- e) No member will accept a gift or hospitality from a Third Party if it is known or suspected that it is being offered or provided with an expectation that a business advantage will be provided in return.
- f) The Company promotes meritocracy and all the agencies are on boarded based on the products and best practices they offer. The on boarding process is also subjected to the agency fulfilling the criteria designed by the company. All members should on-board agencies on merit, ensure compliance with applicable laws and avoid favouritism.
- g) No member will threaten or retaliate against another member who has refused to commit a bribery offence or who has raised concerns under this policy.
- h) If in case a member receives a request for a bribe or is offered a bribe, and if refusal to such payment may jeopardize the member's safety or security, members must promptly report such cases directly to the Compliance Officer or the Managing Director.

- i) Encourage raising concerns about any instance, or suspicion, of malpractice at the earliest possible stage through the available reporting mechanisms.
- j) Read, understand and comply with this policy. Members should at all times, avoid any activity that might lead to, or suggest, a breach of this policy.

**5. DONATIONS AND POLITICAL CONTRIBUTIONS:**

The Company makes charitable donations as per the Company philosophy and only those that are legally allowed. The Company also supports community for development through its various CSR initiatives as applicable by the law.

The Political Contributions are those that are provided as a support to the political organizations, politicians or political initiatives.

The Company strictly does not encourage any such contributions. However, in case of any deviations from this clause, it shall be pre-approved from the Board of Directors and all the concerned parties and must be in compliance with the applicable laws.

The members at all times are expected to adhere to all the applicable laws.

**6. KICKBACK:**

Kickbacks are a certain share of payment that is offered as a commission to the member for preferential treatment or facilitating an improper business service. The Company strictly discourages any such practices.

**7. AUDIT AND COMPLIANCE REVIEW:**

The Company will conduct regular reviews through the internal audit team or external auditing agency. The reviews will be based on the parameters and guidelines decided by the company that will check the compliance of the policy. Communication of the policy to external agencies during engagement, monitoring mechanisms, random samples review of agreements are a few parameters that will be checked during this audit.

**8. GOVERNANCE:**

- a) The Company Compliance Officer is responsible to ensure the adherence to this policy. The Legal Head will be responsible for monitoring the breaches of this policy at the company level.
- b) The Business Unit Heads are responsible for ensuring that everyone complies with the policy in the unit under their control.
- c) The Section or Departmental Heads are responsible to ensure all the members in their department understand and comply with this Policy.
- d) Managers at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy.
- e) All the members dealing with external agencies will be responsible to communicate this policy at the time of engagement with the Company.

**9. CONSEQUENCES OF NON-COMPLIANCE WITH THIS POLICY:**

A strict and appropriate action will be taken against such members as decided by the Management of the Company.

**10. AMENDMENTS TO POLICY:**

The Company reserves the right to amend, abrogate, modify, and revise any or all clauses of this policy depending upon market practices or exigencies of business.

Note: In case any clause of this policy is inconsistent with the provisions of any applicable law for the time being in force, the provisions of the law will prevail.

Approved by: The Board of Directors of LT Foods Limited  
Adopted on: January 30, 2023