

## **Anti-Bribery and Anti-Corruption Policy**

### **Purpose and Policy Statement**

Shree Cement Limited (hereinafter referred to as '**Shree Cement**' or '**SCL**' or '**Company**') is committed to zero tolerance towards any form of bribery or corruption. This Anti-Bribery and Anti-Corruption Policy (hereinafter referred to as '**the Policy**') entails SCL's approach to zero tolerance towards bribery and corruption and outlines its position on the same. As an organization, SCL shall ensure that it complies with all the applicable anti-bribery and anti-corruption laws. SCL shall take appropriate actions against any persons covered by the policy, if found guilty.

### **Scope**

This Policy is applicable to all the directors and employees of SCL and/ or its subsidiaries including those third parties who are working on behalf of SCL/ its subsidiaries (hereinafter referred as 'covered members'). This Policy should be read in conjunction with other applicable policies of Shree Cement.

### **Policy requirements**

#### **a) Bribery, Facilitation payments and Kickbacks**

Bribery, facilitation payments and kickbacks are unofficial, improper and small payments made to secure or expedite a routine action by an official or are typically payments made in return for a business favour or advantage.

The covered members are strictly prohibited from offering, or promising to offer and accepting kickbacks, bribes, facilitation payment or similar consideration of any kind. The Company also does not hire third parties to conduct any act of corruption or bribery on its behalf.

Covered members, while dealing with third parties including with government representatives such as public servants, government officials, government agencies, international organisations, must be mindful of their interactions with such parties and should conduct themselves ethically and courteously while interacting with the representatives.

#### **b) Political & Charitable Contributions**

SCL shall not make any form of political contribution, either directly or indirectly, to any political party or candidate running for public elections except in compliance with the applicable laws and regulations and with the consent of the Board of Directors of the Company including any committee authorized by it. Company's contributions to charitable organizations shall be for legitimate causes only and shall be approved and authorized in accordance with the delegation of authority and Company's policy in this regard. SCL shall disclose all its charitable and political donations duly complying with the applicable regulatory requirements.

Every covered member, while making any political or charitable donations in his or her personal capacity, shall ensure that such contribution does not imply to be a contribution made on behalf of the Company.

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### **c) Gifts and Entertainment**

The covered members are prohibited from providing gift or entertainment to customers, prospects, government officials or their family members when such expenses are not customary or not incurred while conducting Company's business and / or do not satisfy the guidelines enumerated in this Policy and other related policies of the Company.

All the covered members are prohibited from acceptance of gifts and entertainment.

### **d) Third Parties**

This Policy applies to contractors, consultants, sub-contractors, agents, dealers, accounting or law firms, etc. working for the Company and thus they are also prohibited from offering or accepting any type of bribe, kickback and facilitation payment.

SCL shall incorporate anti-bribery and anti-corruption provisions in the contract with third parties in consultation with Company's Legal team, including the right to audit and termination on non-compliance with this Policy.

### **Record Keeping**

SCL shall keep books and records that accurately reflect the Company's transactions, assets and financial position in order to prevent the possibility of bribes.

### **Breach of Policy**

SCL shall take appropriate actions on covered members for any instance of non-compliance or violation of this Policy. Non-awareness of this Policy shall not be considered as an excuse for misrepresentation.

### **Monitoring, Review and Risk Management,**

The Compliance Officer shall be responsible for regular monitoring of the effectiveness and suitability of the Policy and shall take necessary actions for any appropriate changes that are required from time to time.

Any instance of non-compliance with the policy principles can be reported through the grievance mechanism as stipulated in the Stakeholder Engagement Policy of SCL.

### **Communication**

The Policy shall be displayed to all employees through the intranet portal of SCL and to third parties through its corporate website. Through various discussions/ communication forums, SCL shall create awareness about this Policy.

### **Policy Approval**

This Policy was approved by the Board of Directors of SCL at its meeting held on 22<sup>nd</sup> May 2023 and supersedes the existing policy on this matter.

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