

PATANJALI FOODS LIMITED
(Formerly known as Ruchi Soya Industries Limited)

ANTI BRIBERY & ANTI CORRUPTION POLICY

(Approved by the Board of Directors at their meeting held on August 11, 2023)



PATANJALI FOODS LIMITED
(Formerly known as Ruchi Soya Industries Limited)
ANTI BRIBERY & ANTI CORRUPTION POLICY

Effective Date: August 11, 2023

TABLE OF CONTENTS:

Sr. No.	Particulars	Page No.
1	Policy Statement	3
2	Scope of the Policy	3
3	Definitions	3-4
4	Gifts and Hospitality	4
5	Responsibilities of Associates	5
6	Raising a Concern or Complaint	5
7	Protection	5
8	Communication	5
9	Responsibilities of the Policy	5-6
10	Monitoring and Review	6



ANTI BRIBERY & ANTI CORRUPTION POLICY

POLICY STATEMENT

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships, wherever we operate, and to implementing and enforcing effective systems to counter bribery. Our associates (as defined below) are prohibited from engaging in any bribery or potential bribery. This includes a prohibition against both direct bribery and indirect bribery, including payments through third parties. If any associate suspects or becomes aware of any potential bribery involving the Company, it is the duty of that associate to report their suspicion or awareness to the Company at rk.jain@patanjalifoods.com. Bribery is a serious criminal offence and can result in the imposition of severe fines and/or custodial sentences (imprisonment), exclusion from tendering for public contracts, and severe reputational damage.

We therefore take our legal responsibilities very seriously. We will uphold all laws relevant to countering bribery and corruption.

The purpose of this policy is to:

- a) set out our responsibilities to comply with laws against bribery and corruption; and
- b) provide guidance on how to recognise and deal with bribery and corruption issues.

SCOPE OF THE POLICY

This policy applies to all individuals working for Patanjali Foods Limited anywhere in the world (collectively referred to as the "**Company**") and at all levels and grades.

This includes senior managers, officers, directors, employees (whether regular, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home-workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us wherever located (collectively referred to as "**associates**" in this policy).

In this policy, **third party** means any individual or organization that an associate may come into contact with during the course of his/her engagement with the Company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, business associates and government, non-government organizations and public bodies including their advisors, representatives and officials, politicians and political parties.

DEFINITIONS

• **Bribery** is:

- a) The offer, promise or receipt of any gift, hospitality, loan, fee, reward or other advantage to induce or reward behaviour which is dishonest, illegal or a breach of trust, duty, good faith or impartiality in the performance of a person's functions or activities (including but not limited to, a person's public functions, activities in their employment or otherwise in connection with a business); or



- b) The offer or promise of any gift, hospitality, loan, fee, reward or other advantage to a public official with the intention of influencing the public official in the performance of their public function, to obtain a business advantage.
 - c) Bribery includes not only direct payments, but also authorizing or permitting an associate or thirdparty to commit any of the acts or take any part in the actions identified in (a) and (b) above.
- **Corruption** is dishonest, improper and usually unlawful conduct intended to secure a benefit undertaken by a person or organization entrusted with authority to attain illicit benefit or abuse power for one's private gain.
 - Facilitation payments are unofficial payments made to secure or expedite a routine action by authorized official.
 - **Kickbacks** are payments made in return for a business favour/advantage.
 - **Gift** means any item of considerable value, given to/received from a party that has business dealings with the organization.

GIFTS AND HOSPITALITY

This policy does not prohibit normal business hospitality, so long as it is reasonable, appropriate, modest, and bonafide corporate hospitality, and if its purpose is to improve our company image, present our products and services, or establish cordial relations.

Gifts and Hospitality:

- **Must be duly approved.** Normal business hospitality must always be approved at the appropriate level of Company management.
- **Must not be intended to improperly influence.** Associates should always assess the purpose behind any hospitality or entertainment. Hospitality or entertainment with the intention of improperly influencing anyone's decision-making or objectivity, or making the recipient feel unduly obligated in any way, should never be offered or received. Associates should always consider how the recipient is likely to view the hospitality. Similarly, associates must also decline any invitation or offer of hospitality or entertainment when made with the actual or apparent intent to influence their decisions.
- **Must not have the appearance of improper influence.** Gifts can in some cases influence, or appear to influence, decision-making, for example by persuading the recipient to favour the person who made the gift over his own employer. Associates should think very carefully before making, or receiving, gifts. Gifts can occasionally be offered to celebrate special occasions (for example religious holidays or festivals or the birth of a child). No gift should be given or accepted if it could reasonably be seen improperly to influence the decision-making of the recipient.
- **Modest promotional gifts are permitted.** It is acceptable to offer modest promotional materials. The Company allows associates occasionally to receive unsolicited gifts not having considerable value from business contacts provided the gift is given unconditionally and not in a manner that could influence any decision-making process.



RESPONSIBILITIES OF ASSOCIATES

Associates must ensure that they have read and understood this policy and, must at all times comply with the terms and conditions of this policy.

All associates are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Associates must notify their reporting manager or consult an appropriate member of the Human Resource (HR) team as soon as possible if they believe or suspect, or have a reason to believe or suspect, that a breach of this policy has occurred, or may occur in the future.

Any associate who breaches any of the terms of this policy will face disciplinary action, which could result in dismissal for gross misconduct. The Company reserves its right to terminate a contractual relationship with other associates and other associated persons, as the case may be if they breach any of the terms and conditions of this policy.

RAISING A CONCERN OR COMPLAINT

Associates are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, you should raise the matter with your **reporting manager or consult an appropriate member of the Human Resource (HR) team.**

PROTECTION

Associates who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The Company is committed to ensuring that no one suffers any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any detrimental treatment as a result of refusing to take part in corruption, or because of reporting concerns under this policy in good faith, you should inform your reporting manager or a member of the Human Resources team of the Company immediately.

COMMUNICATION

This policy should be explained to new joiners at the time of induction. If you have any query about this policy, you should contact your reporting manager or concerned HR team member.

The Company's zero-tolerance approach to bribery and corruption should be communicated to all agents, suppliers, contractors and business partners at the outset of the Company's business relationship with them and as appropriate thereafter and displayed on the website of the Company.

RESPONSIBILITIES OF THE POLICY

The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.



Anti Bribery & Anti Corruption Policy

The head of the Human Resources Department has primary day-to-day responsibility for implementing this policy. Management at all levels are responsible for ensuring that those reporting to them are made aware of and understand this policy and, if necessary and appropriate, are given adequate and regular training on it.

MONITORING AND REVIEW

The head of the Human Resources Department will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvement identified will be made and incorporated as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption. All associates are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

