

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

OF

MALU PAPER MILLS LIMITED

1. POLICY STATEMENT & OBJECTIVE

This Anti-Bribery and Anti-Corruption Policy (the ‘Policy’ or ‘ABAC Policy’) provides a framework for ensuring compliance with legislations governing bribery and corruption globally.

Malu Paper Mills Limited (Malu Paper or We) commitment is to conduct the business in compliant environment with honesty, integrity and in conformity with the highest possible ethical standards to ensure monitoring, prevention and detection of fraud, bribery and all other corrupt business practices. We take a zero-tolerance approach to bribery and corruption and are committed to act professionally, fairly and with integrity in all our relationships and business dealings wherever we operate. We strive to implement and enforce effective systems to counter bribery and promote “Zero Dishonesty”.

The objective of this policy is to spread awareness about the possible misconducts related to bribery and corruption amongst Company’s employees and set responsibility of all the employees, vendors and partners’ etc. to vigilantly observe and uphold the position against bribery & corruption and to ensure compliance with regulatory requirements with respect to Anti-Bribery and Anti-Corruption laws.

In each of the jurisdictions where we operate, Stakeholders are expected to follow the ABAC Policy or the applicable laws around bribery and corruption, whichever is stricter. No Stakeholder can waive compliance with the Policy. ***This policy should be read in conjunction with the Code of Conduct.***

2. FORMS OF BRIBERY THAT POSE THE GREATEST RISK

There are numerous forms of bribery and corrupt practices, but the following areas pose the greatest risk:

A. Engaging Third Parties

Malu Paper engages multiple third parties to act on its behalf, including vendors, dealers, liaison agents, consultants to interact with government authorities, etc. Every Stakeholder appointed to act on behalf of Malu Paper must be selected on the basis of their commercial and technical expertise and Malu Paper’s need for the products or services.

Stakeholders are prohibited from fulfilling any corrupt offer, request, demand or promise for payment to be made or received directly or through any third party.

B. Facilitation Payments

We prohibit facilitation or grease payments of any kind. It is also our policy that we work to ensure that our Stakeholders do not make facilitation payments on our behalf.

C. Kickbacks

Malu Paper prohibits kickbacks of any kind. It is also our policy that we work to ensure that our Stakeholders do not make kickbacks on our behalf.

D. Employing / Engaging Public Officials

Any employment or engagement of former public officials or their relatives by Malu Paper requires a thorough background check of the individual.

3. RECORD-KEEPING

All accounts, books, invoices and other documents & records must be maintained in reasonable detail which accurately and fairly reflect the transactions and dispositions of the assets of the company.

No accounting entry, expense, provisions will be kept “off the books” in order to facilitate or conceal improper payments or arrangements.

4. HOW TO REPORT A CONCERN?

Every employee who has a concern relating to any issue or suspicion of any non-compliance, malpractice or any other illegitimate arrangement must report the issue to the helpline www.malupaper.com

5. WHISTLE BLOWER PROTECTION

A whistleblower would be given the option to keep his/ her identity anonymous while reporting an incident on Company’s Helpline. The company will make no attempt to discover the identity of an anonymous whistleblower. If the whistleblower’s identity becomes known during the course of the investigation, company will ensure that the identity of the whistleblower will be kept anonymous and confidential to the extent possible, unless required by law or in legal proceedings. Protection under this mechanism

would not mean protection from disciplinary action arising out of false allegations made by a whistleblower.

6. DISCIPLINARY APPROACH

Malu Paper's ABAC Policy shall be promoted and enforced consistently amongst Stakeholders with clear and consistent disciplinary consequences to anyone who violates the Policy. We reserve the right to terminate a contractual relationship with any Stakeholder if they breach this Policy.

7. TRAINING AND COMMUNICATION

As part of the prevention, identification and detection of Anti-bribery and Anti-corruption issues, trainings and risk assessments shall be conducted. Training on this Policy shall form part of the induction process for new Employees at all levels working in areas that are susceptible to ABAC risk. Post joining and completion of the induction process, such new appointees must undergo the same trainings as scheduled for existing Employees. Existing Stakeholders at all levels, shall receive regular, relevant trainings on how to implement and adhere to this Policy throughout the term of their relationship with Malu Paper.

Stakeholders may be required to give an annual certification confirming their compliance with this Policy.

The Policy is reviewed by the Board and adopted at the meeting held on 12th February 2019.

PUNAMCHAND MALU
MANAGING DIRECTOR & CEO