

# **ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**

# **OF**

## **STOVE KRAFT LIMITED**



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## **Introduction and Objective**

**Stove Kraft Limited** is committed to conducting business with honesty, transparency, and integrity. We recognize the negative impact of bribery and corruption on our business operations, stakeholders, and society at large. This policy aims to prevent bribery and corruption in all our business activities and promote a culture of ethical behavior among our employees, contractors, and business partners.

### Scope

This policy applies to all directors, employees, agents, consultants, contractors, and any other individuals who engage in business activities on behalf of our company. It covers all areas of our operations, including but not limited to procurement, sales, marketing, finance, human resources, legal etc.

#### **Policy Statement**

Our company prohibits any form of bribery and corruption, whether direct or indirect, in all our business activities. This includes but is not limited to:

- Offering or accepting bribes, kickbacks, or other improper benefits to or from any individual or organization
- Making facilitation payments to expedite routine government or administrative tasks
- Engaging in fraudulent or unethical business practices
- Giving or receiving gifts, entertainment, or hospitality that may influence business decisions or create a conflict of interest

Chief Human Resources Officer shall ensure implementation of the Policy in true letter and spirit.

#### Responsibilities

All persons to whom this Policy applies, who are responsible for understanding and complying with this policy will:

- refrain from engaging in any form of bribery or corruption.
- report any suspected or actual breaches of this policy to their supervisor, manager, or the company's Vigilance and Ethics officer
- cooperate with any investigation related to suspected or actual violations of this policy.

#### **Training**

The company will provide regular training on anti-bribery and anti-corruption policies and practices to all persons to whom this Policy applies. The training will cover the following topics:

- The company's anti-bribery and anti-corruption policy and procedures
- The legal and ethical implications of bribery and corruption
- How to identify and manage situations that may involve bribery or corruption
- The consequences of violating this policy



#### **Procedure to Raise Concerns**

The company encourages all persons to whom this Policy applies to raise concerns or report suspected or actual breaches of this policy. The company will protect the confidentiality and anonymity of individuals who report in good faith. If you are unsure whether a particular activity constitutes bribery or corruption, or if you have any other questions, you should contact your Department Head in writing or by email or report it immediately. Follow the procedures outlined in the Company's Whistleblower Policy to report their concerns.

## **Record Keeping**

The company will maintain accurate and detailed records of all business transactions to ensure transparency and accountability. These records will be kept in accordance with applicable laws and regulations.

### **Consequences of Violation**

All persons to whom this Policy applies, violates this policy will be subject to disciplinary action, up to and including termination of employment or contract. The company may also take legal action against individuals or organizations involved in bribery or corruption.

#### Conclusion

Our company is committed to conducting business with honesty, transparency, and integrity. We expect all employees, contractors, and business partners to comply with this policy and help us maintain a culture of ethical behavior. We will regularly review and update this policy to ensure its effectiveness and compliance with relevant laws and regulations.

The Board had adopted this Policy at its meeting held on 29th March 2023.