



Anti-Bribery and Anti-Corruption Policy

Doc. No. TCPL/POL/10

Issue No: 02

Revision No: 00

Date: 26.05.2023

At TCPL Packaging Ltd (TCPL), whoever we may deal with and wherever we may operate, we are committed to doing so lawfully, ethically, and with integrity. As a part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated. We must ensure that any third party acting on our behalf also acts accordingly to our policy.

This anti-bribery and anti-corruption policy sets out TCPL's policies and procedures to prevent bribery and corruption. These policies and procedures have been designed to comply with global bribery and corruption legislation.

Scope and Coverage:

TCPL has also implemented risk-sensitive policies and procedures to prevent money laundering and terrorist financing, as required by the Money Laundering Regulations 2007. These include:

- a. Identification and scrutiny of complex or substantial transactions and transactions with no apparent lawful purpose.
- b. Customer due diligence procedures to verify the identity of clients and monitor business relationships and transactions.
- c. Record-keeping requirements for customer due diligence and transaction details for five years.
- d. Implementation of internal controls, risk assessment, compliance monitoring, and communication strategies to ensure the effectiveness of anti-money laundering measures.

Employees must confirm their understanding and compliance with these policies as a part of their ongoing employment assessments and may be required to attend training sessions to support their implementation.

Definition:

Bribery involves the following:

- a. When a financial or other advantage is offered, given, or promised to another person to induce or reward them or another person to perform their responsibilities or duties improperly (it does not have to be the person to whom the bribe is offered that acts improperly); or
- b. When a financial or other advantage is requested, agreed to be received, or accepted by another person to induce or reward them or another person to perform their responsibilities or duties inappropriately (it does not have to be the person who receives the bribe that acts improperly).

It does not matter whether the bribe is:

- a. given or received directly or through a third party (such as someone acting on TCPL 's behalf, for example, an agent, distributor, supplier, joint venture partner, or other intermediary); or
- b. For the benefit of the recipient or some other person.

Bribes can be in many forms, for example:

- a. Money (or cash equivalent such as shares).
- b. Unreasonable gifts or entertainment.
- c. Kickbacks.
- d. Unwarranted allowances or expenses.
- e. Anything else of significant value.

Policies and procedures

General prohibition

All forms of bribery and corruption are prohibited.



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Bribery is prohibited when dealing with any person, whether in the public or private sector, and the provisions of this policy are of general application. However, many countries have specific controls regarding dealing with public officials, and this policy includes specific requirements in these circumstances.

Gifts, hospitality, and expenses

Giving or receiving gifts or hospitality is important to maintaining and developing business relationships. However, all gifts and hospitality should be provided for a genuine, reasonable purpose in business with the cost being reasonable. They should comply with the TCPL's Hospitality and Expenses Policy and local laws. Lavish or unreasonable gifts or hospitality, whether given or received, are unacceptable as they can create the impression that we are trying to obtain or receive favorable business treatment by providing individuals with personal benefits. In addition, gifts and hospitality can themselves be a bribe. Be careful to avoid even the appearance that giving or accepting gifts or hospitality might influence your decisions on behalf of TCPL.

Facilitation payments

All facilitation payments are generally prohibited.

TCPL could be liable for the acts of people who act on our behalf. This includes agents, distributors, suppliers, (together referred to as "third parties"). As such, we are committed to promoting compliance with effective anti-bribery and corruption policies by all third parties acting on behalf of TCPL.

Appropriate due diligence should be undertaken before any third parties are engaged.

Entering any joint venture arrangement without prior approval from Managing Director is prohibited.

The provision of money or anything else of value, no matter how small, to any public official to influence them in their official capacity is prohibited. The prior approval of Unit Head who in turn will take approval from Managing Director is required for the following:

- a. Any payment in respect of fees, salary, or commission (this does not include official fees)
- b. Gifts and hospitality

Reporting Procedure:

Employees who suspect violations are encouraged to report promptly and confidentially through designated channels, including direct communication with Unit Head or Managing Director.

Compliance with the policy

Ensuring compliance with anti-bribery, anti-corruption, is very important for TCPL to uphold ethical standards and legal obligations, safeguarding its reputation.

Approved By Sd/-
Saket Kanoria
Managing Director
Date: 26.05.2023