



INDIAN PHOSPHATE LIMITED

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Date: 1st January 2023

Anti-Corruption, Anti-Bribery and Anti-Money Laundering Policy

1. Purpose:

This policy aims to ensure that Indian Phosphate Limited ("the Company") conducts its business in a transparent, honest, and ethical manner. It has been formulated in compliance with the Prevention of Corruption Act, 1988, the Prevention of Money Laundering Act, 2002, and relevant provisions of the Rajasthan State laws.

2. Scope:

This policy has been designed and established to be applicable and pertinent to a comprehensive range of individuals associated with the Company. This includes, but is not limited to, our full-time and part-time employees, esteemed board directors, high-ranking officers, specialized consultants, dedicated contractors, and the various vendors we collaborate with. Furthermore, any third parties who maintain a professional or business-related association with the Company are also encompassed under the directives of this policy.

3. Definitions

3.1. Corruption: Corruption can be understood as the act wherein an individual, who has been entrusted with a specific power or authority, deliberately and inappropriately utilizes such power or authority to achieve personal benefits or advantages, typically to the detriment of the interests they were entrusted to protect or serve.

3.2. Bribery: Bribery involves the act of providing, presenting, receiving, or requesting something that holds significant value, with the intent to exert



influence over the decisions or conduct of an official or any other individual in a position of authority or responsibility.

3.3. Money Laundering: Refers to the intricate and deliberate process whereby individuals attempt to obscure or mask the true source and origins of funds that have been acquired through illicit means. This is typically achieved by channelling these funds through an array of convoluted banking transactions or a series of commercial activities, with the ultimate objective of making such funds appear as though they have been derived from legitimate sources.

4. Anti-Corruption and Anti-Bribery:

- 4.1.** It is imperative that no individual holding a position as a director, officer, or any other employee status within the company, involve themselves, whether overtly or covertly, in activities that can be characterized as corrupt or as acts of bribery.
- 4.2.** The act of presenting, bestowing, obtaining, or making solicitations of any items or services of tangible value with the aim of swaying the decisions or actions of another entity or individual is explicitly and categorically not allowed.
- 4.3.** Payments made to expedite or simplify procedures, often labelled as facilitation payments and which might sometimes be perceived as normative or conventional in certain contexts, are undeniably and without exception prohibited.
- 4.4.** It is essential that all transactions and commercial interactions carried out in the name of the company are conducted in a manner that is not only transparent but also meticulously documented. These records should be of such a nature that they can endure and be deemed credible under the stringent examination of public observation and assessment.
- 4.5.** There exists an unequivocal requirement for all employees to promptly relay any information, insights, or inklings they might have regarding potential acts of corruption or bribery to the designated mechanism set in place for reporting such concerns.
- 4.6.** No individual shall directly or indirectly engage in, facilitate, or condone the exchange of bribes or inappropriate benefits for commercial or monetary

advantages. Employees are strictly prohibited from proposing, bestowing, or accepting any gifts or payments that might be interpreted as a bribe or inducement. Any solicitations for, or propositions of, bribes shall be immediately declined and promptly reported to the appropriate managerial authority. All financial records and associated documentation must precisely represent and elucidate the character of the corresponding transactions. The establishment or preservation of any undisclosed or unrecorded accounts, funds, or assets is expressly forbidden

4.7. Any business-related entertainment or hospitality must be moderate and strictly for the intent of fostering legitimate business relations. Such actions should not be construed as attempts to unduly influence any decisions regarding the awarding of future business opportunities. The bestowal of gifts to any company personnel is strictly prohibited

4.8. The corporation unequivocally and categorically forbids the engagement in, or endorsement of, any acts constituting bribery or corruption. Violations of this imperative standard will be subject to rigorous disciplinary proceedings, up to and including potential cessation of employment. Furthermore, such transgressions may expose the involved parties to substantial legal ramifications pursuant to the prevailing legal statutes.

5. Anti-Money Laundering (AML):

5.1. Our organization remains unwaveringly dedicated to the principle of ensuring that, under no circumstances, even those that might be unintentional or inadvertent, is it associated with or implicated in activities related to money laundering.

5.2. Diligent Customer Verification (Know Your Customer - KYC): Indian Phosphate Limited, stands resolutely committed to exercising utmost vigilance and thoroughness in ascertaining the bona fide identity of all its clientele, customers, and corporate associates. To this end, IPL shall employ an array of stringent protocols and methods to ensure that every interaction is premised on a foundation of verified and authentic identities.

- 5.3. With the aim of ensuring our uncompromising stance against indirect involvement in money laundering or any potential financial support to entities associated with terrorism, comprehensive due diligence processes will be rigorously employed and meticulously executed for every new client or business entity that wishes to engage with us.
- 5.4. Transactions that, upon observation and review, seem devoid of any discernible logical or business-driven rationale, or those that stand out due to their anomalous nature in comparison to typical transactions, must be promptly brought to the attention of the relevant authorities or departments.
- 5.5. There exists an absolute and non-negotiable obligation on the part of all employees to act promptly in flagging and reporting any transactional activities or client profiles that raise suspicions or appear questionable in nature to the appropriate channels or authoritative bodies within the organization's structure. They are mandated to promptly report any transaction or financial activity that bears the hallmarks of suspicious intent, potentially indicative of money laundering schemes or avenues facilitating the illicit financing of terrorist outfits. Such concerns ought to be communicated expeditiously to the designated internal bodies or to the relevant regulatory and law enforcement authorities, as the situation may demand.
- 5.6. In line with our commitment to transparency and regulatory compliance, it is categorically mandated that every financial transaction, regardless of its magnitude, is captured with impeccable accuracy within the financial ledgers of Indian Phosphate Ltd. Moreover, these records, serving as a testament to our operations' legitimacy, shall be safeguarded and maintained for a tenure not less than 5 years ensuring availability for any potential audits or reviews.
- 6. Documentation and Maintenance of Financial Records:**
- 6.1. It is of paramount importance that every financial transaction, regardless of its magnitude or nature, be captured and documented with utmost precision and entirety, ensuring alignment with the meticulously laid out internal controls and procedures that the organization has established.

- 6.2. Under no circumstances, whether overt or covert, should there be any establishment of accounts that are not fully disclosed or recorded within the company's official ledgers or financial documentation, irrespective of the intent or purpose behind such an action.
- 6.3. The act of manipulating, misrepresenting, or altering any official document in a manner that deviates from its true and factual representation is not only viewed with the highest degree of severity but also stands to invite significant repercussions. These consequences can range from stringent organizational penalties to the most extreme measure of employment termination.

7. Mechanism for Reporting and Safeguarding the Whistle-blower:

7.1. **Obligation to Notify:** It is of paramount significance that any individual within the company, who, during the course of their professional engagements, either becomes suspicious of or acquires definitive knowledge about potential breaches of this policy, takes immediate and unequivocal action to bring such concerns to the attention of the designated authority or department, for instance, the **Compliance Officer "Mr Indra Lal Jain"**. This duty to report is not merely a recommendation but a binding responsibility for the well-being and integrity of the organization. Within our organization, we ardently advocate for our employees to promptly voice their apprehensions or concerns when they encounter or become cognizant of actions that may be deemed as unethical, actions that appear to be in violation of this established policy, or any other instances of impropriety or wrongdoing.

7.2. **Assurance Against Repercussions for Whistle-blowers:** IPL stands firmly by the principle of fostering a culture of transparency and integrity. In line with this commitment, the company ardently assures that any individual, who steps forward to report potential policy violations with genuine intentions and without any malice, will not face any form of adverse action or backlash. Any act of retaliation against such conscientious individuals will be considered a grave offense and treated with utmost seriousness. It stands to uphold and respect the confidentiality pertaining to the identity of the whistle-blower. In this light, we remain unwavering in our commitment to ensure that individuals who come

forth to shed light on such matters are not only safeguarded from any breaches of their identity's confidentiality but are also shielded from any retributive or retaliatory actions that could potentially arise as a consequence of their disclosure. Behind these campaigns is to ensure that all stakeholders, be they

8. Implications and Consequences for Non-compliance (Penalties):

8.1. Engaging in actions that run counter to the stipulations laid out in this policy may invite a spectrum of punitive measures. Depending on the severity and nature of the violation, these could range from internal disciplinary proceedings to the gravest repercussion of termination of employment. Furthermore, it is essential to recognize that such infractions could not only put individual violators at risk but also potentially subject IPL to considerable financial liabilities, legal challenges, and other consequential penalties.

8.2. Infringements or breaches of the directives set forth in this policy can precipitate a range of punitive measures. These disciplinary responses might vary in their intensity and gravitas, starting from minor reprimands and escalating, in instances of grave misconduct, to the extreme step of employment cessation or termination.

8.3. Furthermore, it is noteworthy to emphasize that depending on the magnitude and nature of the policy violation, individuals may find themselves subject to legal proceedings and potential liabilities. Such legal ramifications will be determined and executed in alignment with the comprehensive legal framework and jurisprudential stipulations of Indian law.

9. Periodical Training and Continual Awareness:

9.1. Periodic Policy Training: It is of cardinal importance to Indian Phosphate Limited that every employee is not just superficially acquainted with, but profoundly versed in this policy. To this end, recurrent training sessions will be organized, ensuring that the spirit and letter of the policy is imbibed, resulting in its effective implementation and unwavering adherence.

9.2. Engagement with Stakeholders: To foster an ecosystem of transparency and informed decision-making, periodic awareness campaigns will be orchestrated. The intent behind these campaigns is to ensure that all stakeholders, be they

internal or external, are updated, thereby reinforcing the collaborative commitment to the principles enshrined in this policy.

10. Oversight and Periodic Review:

10.1. The vigilant and comprehensive supervision of Indian Phosphate Limited's adherence to the stipulations enshrined within this policy shall fall under the purview of the designated internal auditors team (Mr Manoj Chajjer & Ms Rehanuma Khan). Through a meticulously structured process, this department shall conduct recurrent assessments, ensuring that every facet of the policy's provisions is being meticulously followed, executed, and upheld. This perpetual monitoring process functions as a bedrock of our unwavering commitment to ethical governance and compliance.


10.2. To ensure the perpetuation of both efficacy and conformity with the fluid landscape of applicable laws and regulations, Indian Phosphate Limited stands committed to conducting thorough and systematic reviews of this policy. The periodicity of these reviews, set at a span of no longer than one year, or in tandem with any exigencies necessitated by evolving legal frameworks, serves as a testament to our resolute determination to uphold the highest standards of ethical conduct. These reviews serve to affirm the continued relevance, adequacy, and compliance of the policy with the intricate mosaic of laws and regulations that govern our operational environment. Such reviews, undertaken with meticulous precision, guarantee that the company is perpetually fortified against any potential misalignment with the legal and regulatory landscape.

10.3. In order to consistently ensure that this policy adheres to all pertinent laws and regulations and retains its efficacy, it will be subjected to a thorough review on an annual basis. However, if circumstances arise or changes occur which necessitate an earlier assessment, we will undertake additional reviews as deemed appropriate and necessary.

11. Commitment:

Indian Phosphate Limited, with unwavering resolve and an enduring ethos of integrity, pledges its commitment to navigate its business undertakings with the utmost ethical standards, steadfastly adhering to every statute, guideline, and

stipulation as mandated by the pertinent legal frameworks in operation. Within this context, it becomes an imperative duty, a responsibility in fact, for each and every individual who finds themselves encompassed and governed by the tenets of this policy, to rigorously uphold, champion, and align their professional conduct with the principles and directives meticulously delineated herein. This alignment not only underscores our dedication to ethical business practices but also fortifies our stance against any malign elements of bribery, corruption, and financial malfeasance in the form of money laundering.

For INDIAN PHOSPHATE LIMITED

DIRECTOR