



Ddev Plastiks Industries Limited

CIN: L24290WB2020PLC241791

Registered Office: 2B, Pretoria Street, Kolkata- 700 071

ANTI-BRIBERY AND ANTI-CORRUPTION POLICY

1. Purpose

Ddev Plastiks Industries Limited is committed to conducting its business ethically and transparently. The company adopts a zero-tolerance approach toward fraud, bribery, and corruption. It is dedicated to acting with integrity, fairness, and professionalism in all business dealings and partnerships across its operations. To this end, the company has implemented robust systems to prevent any form of bribery, corruption, and fraudulent practices.

2. Scope and Applicability

This policy is applicable to all employees, officers, managers, directors, and contractors of Ddev Plastiks Industries Limited. It forms part of the HR Policy adopted by the company relevant extracts / intent whereof has been considered in this policy. It establishes clear guidelines to eliminate bribery and corruption in all business activities and details the responsibilities of each employee and director to ensure compliance.

3. Definitions

- **Anything of Value:** Refers to any item of value, whether tangible or intangible, such as money, gifts, hospitality, travel, job offers, debt forgiveness, charitable donations, or any transfer of benefits.
- **Bribery:** Involves offering or receiving anything of value as an improper incentive or reward for securing business, employment, or other advantages. Examples include inappropriate gifts, hospitality, payments, or favors.
- **Business Partner:** Any agent, distributor, joint venture partner, consultant, or third party authorized to act on behalf of Ddev Plastiks Industries Limited.
- **Corruption:** Abuse of power or position for personal gain, including acts like bribery, fraud, or embezzlement.
- **Gift:** Any tangible item provided or received for free or at a reduced cost.
- **Hospitality:** Intangible benefits provided or received at no cost or at a discount, such as meals, entertainment, or participation in events.

4. Policy

Anti - Bribery & Corruption

- An appropriate committee will investigate any verifiable offence. Disciplinary measures may include suspension or termination from employment, if appropriate to the circumstances. Reputation and goodwill of DPIL is founded on the 'commitment to acting with integrity' throughout the company. DPIL under any circumstance does not accept or solicit bribery of any kind. Any employee of DPIL shall not pay nor offer bribes [cash or kind] or illicit payments to government officials or candidates, political parties, customers or suppliers in order to obtain retain or protect business.
- Employees working with the Company must avoid any activity that may involve acceptance and giving of personal gifts, hospitality or any favour to or from DPIL stakeholders including Customers, Suppliers, Principals, Service Providers, Shareholders and Investors.
- At DPIL, engaging in bribery and corruption constitutes the severest violation of its Code of Conduct. If proven guilty, the employee/employees run the risk of suspension from service, stoppage or withdrawal of increments or incentives, reduction in rank and pay and even dismissal from service / termination of contract as also, at the sole discretion of the Company, exposure to legal proceedings —civil or criminal in nature. Implementation and monitoring of anti-bribery and corruption policy and principles remain within the domain of the Management of DPIL.
- Ddev Plastiks Industries Limited adheres to all Indian anti-bribery and anti-corruption laws, including:
 - The Prevention of Corruption Act, 1988
 - Foreign Contribution Regulation Act, 2010
 - Lokpal and Lokayuktas Act, 2013
 - Prevention of Money Laundering Act, 2002
 - Central Vigilance Commission Act, 2003
 - Fugitive Economic Offenders Act, 2018
 - Black Money (Undisclosed Foreign Income and Assets) and Imposition of Tax Act, 2015

Key Guidelines:

- Employees must not offer or accept bribes, kickbacks, or any item of value to influence decisions or gain undue benefits.
- Using third parties or agents to circumvent this policy is prohibited.
- Bribes can take various forms, including money, gifts, hospitality, travel, employment opportunities, or any other advantage intended to influence outcomes.

5. Disciplinary Action

Any employee found violating this policy may face disciplinary measures, including termination, and could be subject to legal action. Employees are encouraged to seek guidance from their supervisors or senior personnel regarding any suspected violations.

6. Communication and Training

All employees must familiarize themselves with the policy and participate in regular training sessions. Training may be provided through online modules or on-site sessions, with assessments to ensure understanding.

7. Governance and Whistle-Blowing

The management of Ddev Plastiks Industries Limited is committed to enforcing this policy. Employees are encouraged to report any suspected violations directly to their supervisor, HR, or the compliance team at below mentioned IDs

HR Department	dharamveer.daga@ddevgroup.in
Compliance Department	tanvi.goenka@ddevgroup.in

- The company ensures confidentiality during investigations and provides protection against retaliation or discrimination for raising concerns.
- Investigations into reported violations will be thorough, with appropriate disciplinary actions taken against offenders.

8. Policy Amendments

Ddev Plastiks Industries Limited reserves the right to amend this policy as needed.