

BALRAMPUR CHINI MILLS LIMITED

POLICY ON ANTI – BRIBERY

1.0 OBJECTIVE:

Anti-Bribery Policy (the “Policy”) of Balrampur Chini Mills Limited (“BCML” or the “Company”) has been developed in accordance with the BCML Code of Conduct and Business Ethics (the “Code”) and other policies adopted by BCML and in conformance with the legal and statutory framework of anti-corruption legislation prevalent in India.

BCML is committed to the prevention, detection and deterrence of bribery and other corrupt business practices.

The Objective of this policy is to set responsibility for the directors and employees of BCML to maintain high standard of business practices as well as to comply with the anti-corruption laws applicable in India.

2.0 SCOPE AND APPLICABILITY

This Policy shall be in addition of and furtherance to the Code. In view of the above, the Board of Directors of the Company (the “Board”) approved this Policy at its meeting held on 31st July, 2017 and this Policy shall be effective from 1st August, 2017.

This Policy applies to all the directors and employees of the Company across all its functions and locations.

3.0 DEFINITION

Bribery is an offer, promise or receipt of any gift, hospitality, reward or other advantage to induce or reward behaviour which is dishonest, illegal, impartiality or not in good faith in the performance of a person's functions or activities;

Bribery includes not only direct payments, but also authorising or permitting a third party to commit any of the acts or take any part in the actions identified above.

In this Policy, words importing the singular number shall include the plural number and words importing the masculine gender shall, where the context admits, include the feminine and neuter gender.

4.0 PRINCIPLE

No director or employee of the Company shall engage directly or indirectly in Bribery.

5.0 REPORTING AND ACTIONS

Any violation / non-adherence of the Policy shall be reported to the Managing Director / Audit Committee of the Board who will take appropriate action(s) [including but not limited to termination of services].

6.0 MONITORING AND REVIEW

The Executive Committee of the Board will monitor and review the effectiveness of this Policy, considering suitability and adequacy.

7.0 PROTECTION

The Company aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

The Company will ensure that no one suffers from any detrimental treatment as a result of refusing to take part in Bribery, or because of reporting in good faith their suspicion that an actual or potential Bribery has taken place, or may take place in future.

8.0 EXCLUSION

This Policy does not prohibit normal business / corporate hospitality, so long as it is responsible, appropriate, modest, and bona fide, or if its purpose is to improve image of the Company, its products, or establish cordial relations.

The Company may make donations but only if they are ethical and in compliance with this Policy and local applicable laws. No donation should be made which may, or may be perceived to breach applicable law, or any other section of this Policy.

Directors and employees of the Company are also prohibited from receiving gifts unless they are received in accordance with the Code.

9.0 AMENDMENTS

The Board reserves the right to vary and/or amend the terms of this Policy from time to time at its absolute discretion.

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