

## MOLD-TEK PACKAGING LIMITED

### **1. Introduction: Policy for incorporating Ethics and prevention of Corruption.**

At Mold-tek Packaging Limited (MTPL) we strongly believe in the principle of Trust through Transparency and Accountability, thus forming its foundation.

The Company has instituted various Policies, Code of Conduct, Systems and Procedures to ensure that all official dealing and transactions are undertaken and conducted in an honest, ethical and transparent manner without any favour, bias or malafide.

In this endeavour, not only has the company introduced a number of operational and financial policy manuals but has also put in place mechanisms-such as complaint/grievance handling procedure, whistle blower policy etc. to facilitate effective adherence to the laid down system & procedures of the company confirming to its values and the norms of corporate governance.

Refer: <http://www.moldteckpackaging.com/investors.html>

### **2. Objective**

The objective of the policy is to provide a system for detection, reporting and prevention of corruption, bribe, etc., whether committed or suspected.

It is a guide to all directors, employees and various stakeholders on the values, ethics and business principles expected of them in their personal and professional conduct.

The policy strives to:

- i. Promote a culture of zero tolerance to corruption, bribery, fraud, etc.
- ii. Communicate to employees and other stakeholders, the company's approach to dealing with such situation.
- iii. Provide a framework and lay down a procedure for detection, reporting and prevention of such activity.

### **3. Scope**

The policy applies to all such acts committed or suspected, linked to the business of the Company, involving any employee, including the whole-time Directors (employed in any capacity including those deputed by other agencies to carry out any work for and on behalf of the company) and other stakeholders such as vendors, suppliers, contractors, service providers, consultants or any other external agency/person having business relationship and/or associated with the company in any manner, as well as their representatives.

### **4. Definition**

**‘Ethics’** is the moral principle that governs a person's behaviour or the conducting of an activity.

**‘Bribe’** is an inducement, payment, reward or advantage offered, promised, or provided to any person in order to gain any commercial, contractual, regulatory or personal advantage. It is illegal to directly or indirectly offer a bribe or receive a bribe.

It is also a separate offence to bribe a government/public official. “Government/public official” includes officials, whether elected or appointed, who hold a legislative, administrative or judicial position of any kind in a country or territory. A bribe may be anything of value and not just money such as: gifts, inside information, sexual or other favours, corporate hospitality or entertainment,

offering employment to a relative, payment or reimbursement of travel expenses, charitable donation or social contribution, abuse of function and can pass directly or through a third party.

**'Corruption'** includes wrongdoing on the part of an authority or those in power through means that are illegitimate, immoral, or incompatible with ethical standards. Corruption often results from patronage and is associated with bribery.

**'Fraud'** is any intentional or wilful act committed by any individual(s) on his own or in collusion with others to deceive, suppress, cheat or defraud the company or any of its employees and or other stakeholders thereby causing unlawful gain to him/herself or wrongful loss to others, whether in cash or kind.

## **5. What is Expected of Everyone**

You must notify your Manager/HR as soon as possible if you believe or suspect that a breach of or conflict with this Policy has occurred, or may occur in the future. Any employee who breaches this Policy will face disciplinary action, which could result in dismissal. We reserve our right to terminate our contractual relationship with you if you breach this Policy. Any breach of this Policy would also result in imposition of large fines/imprisonment on the individual or the Company as the case may be or termination of contract with a Third Party.

Use good judgment and avoid even the appearance of improper behaviour and greed. In case of any conflict between this policy and any local laws and/ or regulations, including professional obligations, the local laws and/ or regulations will prevail.

The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for the company or under the company's control. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.

## **6. What to do if you are a victim of bribery and corruption**

It is your responsibility to tell your Manager/HR as soon as possible if you are offered a bribe by a third party, you are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of corruption or other unlawful activity. You must refuse to accept or make the payment from or to a third party, explain our Policy against accepting or making such payment, and make clear that the refusal is final and non-negotiable because of this Policy. If you encounter any difficulty making this refusal, you should seek assistance from your Manager/HR.

**For Mold-Tek Packaging Limited**

**Sd/-**

**J Lakshmana Rao**

**Chairman & Managing Director**

\*\*\*\*\*