



Date: 05-03-2019

## Ethical Business Practice Policy

### Purpose and scope

This policy sets out our ethical business practices. It applies to all employees, in relation to our dealings with our people, agents, clients, suppliers, subcontractors, competitors and government officials.

### Policy objectives

We have a duty to act responsibly and to show the highest levels of ethical and moral stewardship. The objectives of this

### Policy is to:

- ❖ Support our commitment to be a responsible business and develop mutually beneficial and sustainable relationships with our stakeholders, based on trust and co-operation
- ❖ Promote safe and fair working conditions, including the responsible management of environmental and social issues within our supply chain by ensuring our suppliers comply with our Supplier Code of Conduct, our policies and other legal requirements.

### Requirements

**Zero tolerance to bribery and corruption:** Bribery and corruption will not be tolerated. It is not acceptable to

- ❖ Give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given, or to facilitate or expedite a routine

### Procedure

- ❖ Request, agree to receive or accept payment from a third party that is known or suspected to have been offered with the expectation that it will obtain a business advantage from Kothari Processors



- ❖ Accept a gift or hospitality from a third party if it is known or suspected to have been offered or provided with an expectation that it will obtain a business advantage from Kothari Processors
- ❖ Threaten or retaliate against another employee who has refused to commit a bribery offence or who has raised concerns under this policy.

All reasonable suspicions must be reported in line with the Whistle blowing procedure and any acts of bribery will be notified by Kothari Processors to the relevant government agency. Any acts of bribery and other forms of corruption, and failure by any employee to report such acts when they reasonably suspect or know another employee has committed them, will be treated as gross misconduct and may result in summary dismissal.

#### **Zero tolerance to fraud:**

All employees, subcontractors, agents and suppliers must act honestly and with integrity at all times. All reasonable suspicions of fraud must be reported in line with the Whistle blowing procedure. No accounts must be kept "off the book" to facilitate or conceal improper payments.

Shailendra Kumar

**Shailendra Kumar Jha**

**General Manager**

