

**ANTI-CORRUPTION POLICY OF
KINECO EXEL COMPOSITES INDIA PRIVATE LIMITED**

Policy history

Updated and adopted by the Board of Directors
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1. Purpose

A culture of integrity is essential for Kineco Exel Composites India Private Limited (KECI). Many of our customers choose to do business with us in part because they know they can trust us for doing things right. The purpose of KECI's anti-corruption policy is to prevent bribery and corruption. It applies to the Company and their employees, suppliers, contractors, consultants and/or any other parties with a business relationship with KECI. Prevention of Corruption Act 1988, Prevention of Money Laundering Act 2002 and all other applicable local laws always need to be complied with - this policy only complements the requirements set by local legislation.

The Anti-Corruption Policy should be understood as something more than just an acknowledgment of the rules. It reflects a personal commitment to take responsibility for our actions and always to work with integrity.

2. Gifts and hospitality - What is allowed and what is prohibited?

Corruption is defined as the abuse of one's position for KECI's or private gain.

Accepting gifts and entertainment from business partners or offering such favours can reduce our credibility and should therefore generally be avoided. It makes KECI vulnerable to accusations that business decisions are influenced by factors other than merit.

Employees or associates must therefore not directly or indirectly offer, make, seek or accept gifts, payment, entertainment or services to or from actual or potential business partners which are not within the bounds of customary business hospitality or which are prohibited by applicable law.

Business gifts of monetary value less than Rs. 4,000 (Rupees Four Thousand Only) may be given and received as a courtesy, as token of regard or esteem, or to promote goodwill. Such gifts should generally bear the company's logo or trademark. Gifts or other items of value may never be given to influence any act or decision of a person in his or her official capacity.

Hospitality (such as dinners, seminars, entertainment or other kind of out-of-office activity) expressed to associates should always be business related and appropriate considering the circumstances. Any hospitality with monetary value exceeding Rs. 4,000 (Rupees Four Thousand Only) should be approved by the Managing Director.

Cash payments of any kind to a third party to influence any act or decision of a person in his/her official capacity are strictly prohibited. Accepting cash payments from any third party is also strictly prohibited.

Any exceptions to the above rules are subject to the prior and written approval of KECI by any two members of the Board of KECI. Employees or associates who have questions about a specific situation should contact the Finance Controller for advice.

3. What to do if you suspect or see a risk of corruption

All employees and business associates of KECI are required to report any suspected or observed violations of the law or this policy - or if they are asked to do something that might be a violation - by using the whistleblowing channel that can be found on KECI website at <https://www.kinecoexelindia.com>.

You may also contact your supervisor, manager or KECI Finance Controller to raise any concerns or when in doubt about the best course of action in a particular situation.

In order to ensure objective and confidential process, the reports are received by an external party who has the responsibility of initiating the necessary processes and following up the matter in question. All reports will be taken with due seriousness, reviewed diligently and resolved objectively and properly. We have zero tolerance for any form of retaliation of any kind against individuals who voice their concerns, report violations or assist in investigations of possible violations. Individuals who report a suspected violation in good faith will not be subject to any retributions or punishment by KECI, even if this claim is later found to be without merit.

4. Consequences of violation of policy

KECI applies zero tolerance for any violations of this Policy. Violations by KECI employees will result to disciplinary actions, such as dismissal, sanctions or legal actions. KECI will stop all cooperation with any business partners, such as suppliers, contractors, that violate this Policy.

5. Responsibilities and ownership

This Policy has been approved & adopted by the Board of Directors of KECI.

KECI's Finance Controller is responsible of the interpretation and implementation of this Policy.

The Finance Controller is also responsible for ensuring that an adequate system of internal controls exists and that such controls operate effectively.

Each KECI employee is responsible for ensuring that he or she, as well as any direct reporting subordinate, is acting correctly and in accordance with this Policy and all applicable national and international laws and regulations in every country KECI operates in.

On Behalf of the Board of Directors
Kineco Exel Composites India private Limited



Shekhar Sardesai
Managing Director



Rohit Verlekar
Chief Operating Officer