



RAVIRAJ FOILS LIMITED. EHS PROCEDURE

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TITLE: Business Integrity Policy	DOC. NO.	RFL/EHS/PR/38
	REV. NO.	00
	EFFECTIVE DATE	20/08/2024
	REVIEW DATE	19/08/2025
	SUPERSEDES	NIL

1. Purpose

This policy outlines Raviraj Foils Ltd's commitment to conducting business with the highest level of integrity and compliance. The policy covers legal compliance, anti-corruption measures, and the establishment and maintenance of a robust Code of Conduct. This ensures that all business activities are carried out in accordance with applicable laws, international standards, and ethical principles.

2. Scope

This policy applies to all employees, contractors, and stakeholders associated with Raviraj Foil Ltd, across all facilities and operational areas.

3. Policy Statements

3.1 Legal Compliance

Objective: Ensure that Raviraj Foil Ltd operates in full compliance with applicable laws and relevant aspects of customary law.

Quantifiable Target: Achieve and maintain 100% compliance with all applicable legal requirements across all facilities by the end of the 2024 fiscal year.

Application: This criterion applies to all facilities.

Commitment:

Raviraj Foil Ltd will maintain systems to stay informed about applicable legal requirements and ensure compliance across all operations.

In cases where a conflict arises between applicable law and customary law, the company will prioritize compliance with applicable law.

PREPARED BY:	CHECKED BY:	APPROVED BY:
		
Safety Officer	Sr. EHS Officer	HR - Head
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Roles & Responsibilities:

Compliance Officer (CO): Oversee the implementation and monitoring of legal compliance across all facilities.

Legal Team: Regularly review and update compliance procedures to align with current laws.

All Employees: Ensure that their actions are in compliance with applicable laws.

3.2 Anti-Corruption

Objective: Prevent and combat all forms of corruption, including extortion and bribery, in alignment with applicable law and international standards.

Quantifiable Target: Achieve zero incidents of corruption, bribery, or extortion across all facilities by the end of the 2024 fiscal year.

Application: This criterion applies to all facilities.

Commitment:

Raviraj Foil Ltd is committed to zero tolerance for corruption, extortion, and bribery.

The company will implement strict anti-corruption policies and ensure that all employees and partners understand and adhere to these standards.

Roles & Responsibilities:

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Compliance Officer (CO): Lead the development and enforcement of anti-corruption policies.

Internal Audit Team: Conduct regular audits to detect and prevent corrupt practices.

All Employees and Contractors: Report any suspected instances of corruption through established channels.

3.3 Code of Conduct

Objective: Establish and maintain a Code of Conduct that reflects Raviraj Foil Ltd's commitment to high standards of environmental, social, and governance (ESG) performance.

Quantifiable Target: Implement the Code of Conduct across all facilities by Q4 2024 and ensure 100% employee acknowledgment of the Code by the end of the year.

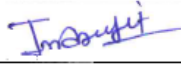
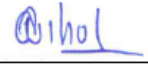
Application: This criterion applies to all facilities.

Commitment:

Raviraj Foil Ltd will implement a Code of Conduct that outlines principles for ethical business conduct, including environmental, social, and governance performance.

The Code of Conduct will be publicly disclosed and made accessible to all stakeholders.

The Code of Conduct will be reviewed at least every five years, or more frequently if there are significant changes in the business or identified control gaps.

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Review Triggers:

Significant changes to the business that alter material environmental, social, or governance risks.

Indications of control gaps or areas where the Code of Conduct is not effectively mitigating risks.

Roles & Responsibilities:

Compliance Officer (CO): Develop, maintain, and review the Code of Conduct.

HR Manager: Ensure that the Code of Conduct is publicly disclosed and accessible.

All Employees and Contractors: Adhere to the principles outlined in the Code of Conduct and report any violations.

4. Risk Assessment

Objective: Identify and mitigate risks related to business integrity, including legal compliance, corruption, and adherence to the Code of Conduct.

Quantifiable Target: Conduct comprehensive risk assessments across all facilities by Q3 2024 and implement risk mitigation strategies within the same fiscal year.

Approach:

Conduct annual risk assessments focusing on legal and ethical compliance.

Prioritize identified risks and implement necessary mitigation strategies.

Regularly update the risk assessment to reflect changes in the legal environment or business operations.

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5. Training and Awareness

Objective: Ensure all employees are aware of and understand the importance of legal compliance, anti-corruption measures, and the Code of Conduct.

Quantifiable Target: Provide mandatory training to 100% of employees and contractors by Q4 2024.

Application: This policy applies to all employees and contractors.

Commitment:

Provide mandatory training on legal compliance, anti-corruption policies, and the Code of Conduct at least once a year.

Include new employees in the training program as part of their onboarding process.

Roles & Responsibilities:

Training Coordinator: Develop and deliver training programs.

Department Heads: Ensure employee participation and understanding of the training materials.

6. Monitoring and Continual Improvement

Objective: Continuously monitor compliance with this policy and improve business integrity practices.

Quantifiable Target: Review and improve business integrity practices annually with at least two improvement initiatives implemented by the end of each fiscal year.

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Approach:

Regularly review and update policies and procedures based on audit findings, legal updates, and stakeholder feedback.

Engage stakeholders in discussions about improving business integrity and incorporate their feedback into policy updates.

Roles & Responsibilities:

Internal Audit Team: Monitor compliance and report on the effectiveness of the policy.

Compliance/HSE officer Oversee the continual improvement process and ensure that updates are implemented.

7. Public Disclosure

Objective: Ensure transparency in business integrity practices through public disclosure.

Quantifiable Target: Publish the Code of Conduct and related policies on the company's website by Q3 2024 and include regular updates in the annual sustainability report.

PREPARED BY:

CHECKED BY:

APPROVED BY:

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[Signature]

@ihol

Safety Officer

Sr. EHS Officer

HR - Head

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Application: This policy applies to all public communications and disclosures.

Commitment:

The latest version of the Code of Conduct will be made publicly available on the company's website.

Regular updates and reports on legal compliance and anti-corruption efforts will be included in the company's sustainability report.

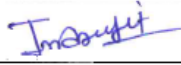
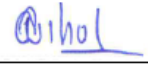
Roles & Responsibilities:

HR Manager: Ensure timely and accurate public disclosure of the Code of Conduct and related policies.

This policy will be reviewed annually or upon significant changes in operations or external requirements, with updates made as necessary to ensure continuous alignment with best practices and stakeholder expectations.

8. REVISION HISTORY:

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
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Sr. EHS Officer

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