1. Purpose

The purpose of this Conflict of Interest Policy is to ensure that all employees, directors, officers, and stakeholders of Raviraj Foils Ltd. act in the best interests of the company and avoid any situations where personal interests may conflict with their responsibilities. This policy aligns with the Global Reporting Initiative (GRI) standards and aims to maintain the highest level of integrity and transparency in all business dealings.

2. Scope

This policy applies to all employees, directors, officers, contractors, and any other stakeholders involved with Raviraj Foils Ltd. It covers all business activities, including decision-making processes, contractual engagements, and interactions with third parties.

3. Definition of Conflict of Interest

A conflict of interest occurs when an individual's personal interests, relationships, or activities interfere, or appear to interfere, with their ability to act in the best interests of the company. This includes situations where an employee or their immediate family members may benefit personally from decisions made in their professional capacity.

4. Core Principles

Transparency: All potential conflicts of interest must be disclosed promptly and transparently to ensure that they are managed effectively.

Objectivity: Employees and stakeholders must act with objectivity, making decisions based solely on the best interests of the company, free from personal bias or influence.

Integrity: Maintaining integrity in all business dealings is paramount. Even the appearance of a conflict of interest must be avoided to uphold trust and confidence.

5. Common Types of Conflicts of Interest

Personal Financial Interests: Situations where an employee or their family members have a financial interest in a company or organization that does business with Raviraj Foils Ltd.

Outside Employment: Engaging in outside employment or consulting work that competes with or detracts from the employee's responsibilities at Raviraj Foils Ltd.

Gifts and Hospitality: Offering or accepting gifts, hospitality, or other benefits from suppliers, customers, or competitors that could influence, or appear to influence, business decisions.

Related-Party Transactions: Entering into transactions with entities or individuals with whom an employee has a personal relationship, without proper disclosure and approval.

Use of Company Resources: Using company resources, information, or assets for personal gain or for the benefit of others outside the company.

6. Quantified Objectives

Objective 1: Achieve 100% completion of conflict of interest training for all employees, directors, and officers annually.

Objective 2: Ensure 100% disclosure of all actual, potential, or perceived conflicts of interest by employees through the annual declaration process.

Objective 3: Conduct at least two internal audits per year to assess compliance with the Conflict of Interest Policy.

Objective 4: Ensure that 100% of new employees complete conflict of interest training within the first 30 days of employment.

7. Disclosure and Reporting

Mandatory Disclosure: All employees, directors, and officers must disclose any actual, potential, or perceived conflicts of interest as soon as they arise. Disclosure must be made to the Compliance Officer or designated authority within the company.

Annual Declaration: All employees and directors are required to complete an annual conflict of interest declaration form, disclosing any potential conflicts that may exist.

Reporting Mechanism: Employees are encouraged to report any observed or suspected conflicts of interest involving others. Reports can be made confidentially to the Compliance Officer.

8. Management of Conflicts of Interest

Assessment: Upon disclosure, the Compliance Officer or designated authority will assess the nature and extent of the conflict and determine the appropriate course of action.

Mitigation: Actions to mitigate conflicts of interest may include recusal from decision-making processes, divestment of personal interests, or reassignment of duties.

Documentation: All disclosed conflicts of interest and the steps taken to address them must be documented and retained for audit purposes.

9. Training and Awareness

Mandatory Training: All employees, directors, and officers must undergo mandatory training on conflict of interest principles, disclosure procedures, and the importance of maintaining objectivity and integrity in their roles.

Ongoing Communication: The company will provide ongoing communication and updates on the Conflict of Interest Policy, ensuring that all stakeholders are aware of their obligations and the procedures for disclosure and reporting.

10. Consequences of Non-Compliance

Disciplinary Action: Failure to disclose a conflict of interest, or engaging in activities that create a conflict of interest without proper management, may result in disciplinary action, up to and including termination of employment or business relationships.

Legal Implications: In cases where a conflict of interest leads to illegal or unethical behavior, the company may pursue legal action against the individuals involved.

11. Review and Revision

Regular Review: This Conflict of Interest Policy will be reviewed annually or as needed to ensure it remains relevant and effective in addressing potential conflicts within the company.

Revision History: Any changes or updates to this policy will be documented in the revision history, and all stakeholders will be informed of the changes.

Sr. No.	Issue Date	Reason for revision	Revision No.	Obsolete Doc No.
1	20/08/2024	First Issue	00	-

PREPARED BY:	CHECKED BY:	APPROVED BY:
Safety Officer	**Sr. EHS Officer**	**HR - Head**
DATE: 20/08/2024	**DATE:** 20/8/2024	**DATE:** 20/08/2024

MASTER COPY