



RAVIRAJ FOILS LIMITED. EHS PROCEDURE

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TITLE: Anti-Competitive Practices Policy	DOC. NO.	RFL/EHS/PR/45
	REV. NO.	00
	EFFECTIVE DATE	20/08/2024
	REVIEW DATE	19/08/2025
	SUPERSEDES	NIL

1. Purpose

The purpose of this Anti-Competitive Practices Policy is to ensure that all employees, directors, officers, and stakeholders of Raviraj Foils Ltd. conduct business in compliance with competition laws and avoid any activities that may restrict, distort, or prevent fair competition. This policy aligns with the Global Reporting Initiative (GRI) standards and is designed to promote fair business practices and integrity in the marketplace.

2. Scope

This policy applies to all employees, directors, officers, contractors, suppliers, and any other stakeholders involved with Raviraj Foils Ltd. It covers all business activities, including pricing, marketing, sales, procurement, and any interactions with competitors.

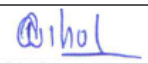
3. Definition of Anti-Competitive Practices

Anti-competitive practices include any actions that unfairly restrict competition or create an unfair advantage in the marketplace. This includes, but is not limited to, price-fixing, market allocation, bid-rigging, abuse of market dominance, and the creation of monopolies.

4. Core Principles

Fair Competition: Raviraj Foils Ltd. is committed to conducting business in a manner that promotes fair competition and complies with all applicable competition laws.

Integrity and Transparency: All business practices must be conducted with integrity and transparency, avoiding any actions that could be perceived as anti-competitive.

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

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Compliance with Laws: All employees and stakeholders must comply with relevant competition laws and regulations, both domestically and internationally.

5. Quantified Objectives

Objective 1: Achieve 100% completion of anti-competitive practices training for all employees, directors, and officers annually.

Objective 2: Maintain zero incidents of reported and substantiated anti-competitive behavior annually.

Objective 3: Conduct at least two internal audits per year focused on compliance with competition laws.

Objective 4: Ensure 100% of third-party suppliers and contractors acknowledge and commit to the Anti-Competitive Practices Policy by signing a declaration.

6. Prohibited Practices

Price-Fixing: Agreements with competitors to fix prices or terms of sale are strictly prohibited.

Market Allocation: Dividing or allocating markets, territories, or customers with competitors to avoid competition is prohibited.

Bid-Rigging: Colluding with competitors to manipulate the outcome of a bidding process is prohibited.

Abuse of Dominance: Using a dominant market position to unfairly limit competition, restrict entry, or harm competitors is prohibited.

Monopolistic Practices: Engaging in activities designed to create or maintain a monopoly, to the detriment of competitors and consumers, is prohibited.

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7. Responsibilities

Board of Directors: The Board is responsible for ensuring that the company's business practices comply with competition laws and promoting a culture of fair competition.

Management: Managers are responsible for enforcing this policy within their teams, conducting regular risk assessments, and ensuring that their business practices do not violate competition laws.

Compliance Officer: The Compliance Officer is responsible for overseeing the company's compliance with competition laws, conducting internal audits, and investigating any reports of anti-competitive behavior.

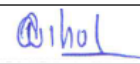
Employees: All employees are responsible for understanding and complying with this policy, completing required training, and reporting any suspicious activities or violations.

8. Training and Awareness

Mandatory Training: All employees, directors, and officers must complete mandatory training on anti-competitive practices annually. Training programs will cover relevant competition laws, prohibited practices, and the importance of fair competition.

Ongoing Communication: The company will provide ongoing communication and updates on competition law compliance, ensuring that all stakeholders are aware of their obligations and the procedures for reporting suspected violations.

9. Competition Law Compliance and Monitoring

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Regular Risk Assessments: The company will conduct regular assessments to identify potential risks related to anti-competitive practices. This includes evaluating business practices, partnerships, and market activities.

Internal Audits: The Compliance Officer will conduct at least two internal audits per year focused on compliance with competition laws. These audits will evaluate the effectiveness of the company's controls and identify any areas for improvement.

Third-Party Due Diligence: All third-party suppliers, contractors, and business partners must undergo due diligence to assess their compliance with competition laws. Contracts will include clauses requiring adherence to this policy.

10. Reporting and Whistleblowing

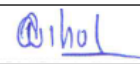
Reporting Mechanisms: Employees and stakeholders are encouraged to report any suspected anti-competitive behavior. Reports can be made anonymously through the company's whistleblowing hotline or directly to the Compliance Officer.

Protection from Retaliation: The company strictly prohibits retaliation against anyone who reports a violation of this policy in good faith. All reports will be treated confidentially and investigated thoroughly.

11. Response to Anti-Competitive Behavior

Investigation: All reported incidents of anti-competitive behavior will be promptly and thoroughly investigated by the Compliance Officer or an appointed investigation team.

Disciplinary Action: Employees found to have engaged in anti-competitive practices will be subject to disciplinary action, which may include termination of employment, legal action, or other appropriate measures.

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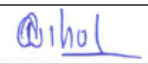
Corrective Measures: The company will implement corrective measures to address any identified weaknesses in its competition law compliance program and prevent future occurrences.

12. Review and Revision

Regular Review: This Anti-Competitive Practices Policy will be reviewed annually or as needed to ensure it remains effective and up-to-date with legal requirements and best practices.

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	-

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